

**08/20/2010 -----NSR IMS - PROJECT RECORD -----**

PROJECT#: 143272 PERMIT#: 7711A STATUS: PENDING  
RECEIVED: 12/19/2008 PROJTYPE: AMEND AUTHTYPE: CONSTRUCT  
RENEWAL: 10/21/2014

DISP CODE: **C**ISSUED DT: **08/20/2010**  
**for**

PROJECT ADMIN NAME: ASPHALT ROOFING PRODUCTION FACILITY  
PROJECT TECH NAME: ASPHALT ROOFING PRODUCTION FACILITY

**Assigned Team: MECH/CONST TEAM****STAFF ASSIGNED TO PROJECT:**

HUNSBERGER, JOANNA	- REVIEWER2 -	AP INITIAL REVIEW
OYLER, TONI	- REVIEWER1 -	AP INITIAL REVIEW
GALVAN, JAVIER	- REVIEW ENG -	MECH/CONST TEAM

**CUSTOMER INFORMATION (OWNER/OPERATOR DATA)**

ISSUED TO: BUILDING MATERIALS CORPORATION OF AMERICA

COMPANY NAME: Building Materials Corporation of America

CUSTOMER REFERENCE NUMBER: **CN602717464****REGULATED ENTITY/SITE INFORMATION**REGULATED ENTITY NUMBER: **RN100788959**

ACCOUNT: DB0378S

PERMIT NAME: GAF MATERIALS

REGULATED ENTITY LOCATION: 2600 SINGLETON BLVD

REGION 04 - DFW METROPLEX

NEAR CITY: DALLAS

COUNTY: DALLAS

**RECEIVED****OCT 19 2010**TCEQ  
CENTRAL FILE ROOM**CONTACT DATA**

CONTACT NAME: MR DOUG HARRIS

CONTACT ROLE: RESPONSIBLE OFFICIAL

JOB TITLE: ENGINEERING MANAGER

ORGANIZATION: BUILDING MATERIALS CORPORATION OF AMERICA

MAILING ADDRESS: 2600 SINGLETON BLVD, DALLAS, TX, 75212-3738

PHONE: (214) 637-8909 Ext: 0

**PROJECT NOTES:**

01/14/2009 DFC 1/14/2009

01/14/2009 SR DOC #372667

01/14/2009 PN1 DOC #372990

08/16/2010 CONTESTED CASE HEARING REQUEST DENIED. PROJECT/PERMIT REMANDED TO ED FOR SIGNATURE.

**PERMIT NOTES:**

12/09/2009 INCORPORATE STANDARD PERMIT NO. 91414 AT NEXT AMEND. OR RENEWAL

**FEE:**

Reference	Fee Receipt Number	Amount	Fee Receipt Date	Fee Payment Type
484677	R911983	900.00	12/29/2008	CHECK

**PUBLIC NOTICE:**

Public Hearing Req Number	Public Meeting Req Number	Comment Count	Alternative Languages
1	0	1	SPANISH

**TRACKING ELEMENTS:**

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	12/19/2008	
ADMIN DEFICIENCY CYCLE	01/09/2009	01/13/2009
SITE REVIEW RFC SENT TO REGION (DATE)	01/09/2009	
PUBLIC NOTICE DRAFT SENT TO COMPANY (DATE)	01/13/2009	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	01/14/2009	
COMPANY APPROVED DRAFT PUBLIC NOTICE (DATE)	01/14/2009	
LEGISLATORS NOTIFIED OF APPLICATION RECEIVED (DATE)	01/14/2009	
PROJECT DECLARED ADMIN COMPLETE (DATE)	01/14/2009	
RECEIVED REGION RESPONSE TO SITE REVIEW RFC (DATE)	01/22/2009	
PUBLIC NOTICE COMMENT PERIOD (NSR 1ST NOTICE)	02/05/2009	03/07/2009
PUBLIC HEARING REQUESTED (DATE)	02/13/2009	
EMISSIONS MODELING CYCLE DONE BY APPLICANT	04/29/2009	05/06/2009
COMPLIANCE HISTORY REVIEW COMPLETED (DATE)	05/20/2009	
DRAFT PERMIT RFC SENT TO REGION (DATE)	05/20/2009	
WORKING DRAFT PERMIT REVIEW CYCLE	05/20/2009	01/08/2010
APPLICANT RESPONSE TO DRAFT PERMIT (DATE)	06/18/2009	
APPLICANT RESPONSE TO DRAFT PERMIT (DATE)	07/17/2009	
DEFICIENCY CYCLE	07/17/2009	08/12/2009
APPLICANT RESPONSE TO DRAFT PERMIT (DATE)	08/03/2009	
APPLICANT RESPONSE TO DRAFT PERMIT (DATE)	09/02/2009	
MEETING WITH INDUSTRY AND TCEQ STAFF (DATE)	10/21/2009	
APPLICANT RESPONSE TO DRAFT PERMIT (DATE)	11/25/2009	
APPLICANT RESPONSE TO DRAFT PERMIT (DATE)	12/11/2009	
APPLICANT RESPONSE TO DRAFT PERMIT (DATE)	12/23/2009	
DRAFT PERMIT RFC SENT TO REGION (DATE)	01/20/2010	
2ND PUBLIC NOTICE FINALIZED AND SENT (DATE)	02/08/2010	
RECEIVED REGION RESPONSE TO DRAFT PERMIT RFC (DATE)	02/09/2010	
PHONE CONFERENCE (DATE)	03/01/2010	
PUBLIC NOTICE COMMENT PERIOD (TITLE V OR NSR #2)	03/11/2010	04/10/2010
RTC DRAFT PERIOD	04/11/2010	06/10/2010
RTC TO LEGAL (DATE)	05/14/2010	
WPO FINAL PACKAGE CYCLE	07/28/2010	08/02/2010
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE)	08/10/2010	
POSTED TO EXECUTIVE DIRECTOR'S AGENDA (DATE)	08/10/2010	
FINAL PACKAGE REWORK CYCLE	08/11/2010	08/20/2010
FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)	08/11/2010	
RTC FILED WITH OCC (DATE)	08/12/2010	
PUBLIC HEARING DENIED (DATE)	08/16/2010	
PUBLIC HEARING HELD (DATE)	08/16/2010	

**Permit Unit Type:**

PROJECT ATTRIBUTES



**PROJECT ATTRIBUTES:**

Attributes	Value
CAPACITY	171
CAPUNITS	TPH
MACT	AAAAAAA
NSPS	DC & UU

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**PERMIT VOIDS:**

Permit	Void Reason
81652	CONSOLIDATION

Bryan W. Shaw, Ph.D., *Chairman*  
Buddy Garcia, *Commissioner*  
Carlos Rubinstein, *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



J. Galvan

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

August 20, 2010

MR DAVID FUELLERMAN  
PLANT MANAGER  
BUILDING MATERIALS CORPORATION OF AMERICA  
2600 SINGLETON BLVD  
DALLAS TX 75212-3738

Re: Permit Amendment Application  
Permit Number: 7711A  
Asphalt Roofing Production Facility  
Dallas, Dallas County  
Regulated Entity Number: RN100788959  
Customer Reference Number: CN602717464  
Account Number: DB-0378-S

Dear Mr. Fuellerman:

This is in response to your letter received December 19, 2008 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 7711A. We understand that you propose to update emissions, authorized under your permit, as a result of recent stack testing on various emissions units located at the site. We further understand that you wish to correct permit representations for units that no longer exist, and you also wish to consolidate by incorporation into this permit Standard Permit Registration Number 81652, which will be voided upon approval of this permit amendment.

As indicated in Title 30 Texas Administrative Code § 116.116(b) and § 116.160 [30 TAC § 116.116(b) and § 116.160], and based on our review, Permit Number 7711A is hereby amended. This information will be incorporated into the existing permit file. Enclosed are revised special conditions pages and a maximum allowable emission rates table to replace those currently attached to your permit. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met.

No planned maintenance, startup, and shutdown emissions have been reviewed or represented in this application, and none are authorized by this permit.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory

Mr. David Fuellerman

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August 20, 2010

Re: Permit Number 7711A

Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

[http://www.tceq.state.tx.us/compliance/compliance\\_support/qa/env\\_lab\\_accreditation.html](http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html)

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at [labprgms@tceq.state.tx.us](mailto:labprgms@tceq.state.tx.us).

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the effective date of the approval. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Javier Galván, P.E., at (512) 239-1319 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. David Fuellerman

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August 20, 2010

Re: Permit Number 7711A

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,



Steve Hagle, P.E., Director  
Air Permits Division  
Office of Permitting and Registration  
Texas Commission on Environmental Quality

SH/JG/aw

Enclosures

cc: Latha Kambham, Ph.D., Consultant, Trinity Consultants, Dallas  
Ms. Christine M. Otto Chambers, Consultant, Trinity Consultants, Dallas  
Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health  
Services, Dallas  
Air Section Manager, Region 4 - Fort Worth

Project Number: 143272

## SPECIAL CONDITIONS

Permit Number 7711A

### EMISSION LIMITATIONS

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in the attached table. (8/10)

### FUEL SPECIFICATIONS

2. Fuel for the facilities shall be pipeline-quality, sweet natural gas. Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ). (8/10)
3. Upon request by the Executive Director of the TCEQ, the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel utilized in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis. (8/10)

### FEDERAL APPLICABILITY

4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60 promulgated for Asphalt Processing and Asphalt Roofing Manufacture in Subpart UU, for Small Industrial-Commercial-Institutional Steam Generating Units in Subpart Dc, and with the General Provisions set forth in Subpart A. (8/10)
5. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Area Sources in 40 CFR Part 63 promulgated for Asphalt Processing and Asphalt Roofing Manufacture, Subparts A and AAAAAAA. (8/10)

### OPACITY/VISIBLE EMISSION LIMITATIONS

6. In accordance with the EPA Test Method (TM) 9 or equivalent, and except for those periods described in Title 30 Texas Administrative Code (30 TAC) §§ 101.201 and 101.211, opacity of emissions from the Coalescing Filter Mist Systems (Emission Point No. [EPN] CFL/34), the Electrostatic Precipitator (EPN CFL/34) when used as a

## SPECIAL CONDITIONS

Permit Number 7711A

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back-up control device for the filter mist systems, all dust collector stacks, all process heater vents, and building vents shall not exceed 5 percent averaged over a six-minute period. (8/10)

7. In accordance with the U.S. EPA TM 9 or equivalent, and except for those periods described in 30 TAC §§ 101.201 and 101.211, opacity of emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed 0 percent averaged over a six-minute period, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of emissions from any blowing still shall not exceed 0 percent averaged over a six-minute period. Opacity of emissions from any storage silo and mineral handling facility shall not exceed 1 percent averaged over a six-minute period. (8/10)
8. No visible emissions from the asphalt processing and asphalt roofing manufacturing operations and facilities, roads, or travel areas shall leave the property. Visible emissions shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined using the U.S. EPA TM 22 or equivalent. If this condition is violated, additional controls or process changes may be required to limit visible particulate matter (PM) emissions. Stack emissions may leave the plant property provided that opacity restrictions are not violated. (8/10)

## OPERATIONAL LIMITATIONS, WORK PRACTICES, AND PLANT DESIGN

9. The company has represented the following to comply with all TCEQ rules and regulations:
  - A. The permitted emission limits for all emission point numbers (EPN), with the exception of the Standby Boiler (EPN BLR 5), are based on 8,760 annual hours of operation. Operation of the Standby Boiler shall be limited to 480 hours per year. (8/10)
  - B. All filler and backing material shall be received and transferred within the building with no visible emissions leaving the building. (8/10)
  - C. The emissions from Stillyard Asphalt Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120; from Blowing Stills T-13 and T-26; from truck and railcar loading and unloading operations; and from the self-seal asphalt storage tank shall be vented to the direct-flame incinerator. (8/10)

SPECIAL CONDITIONS

Permit Number 7711A

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- D. Upon issuance of the amended permit, the direct-flame incinerator shall be operated at an average incineration temperature of 1450°F measured immediately downstream of the incinerator, based on a one-hour averaging period, during normal operations. Normal operations are herein defined as any time period when asphalt blowing is occurring, and emissions from the blowing are vented to the direct-flame incinerator. The direct-flame incinerator shall be operated at a minimum incineration temperature of 1300°F during Standby Operating Conditions to assure compliance with the maximum allowable emission rates table (MAERT) limits for volatile organic compounds (VOC) from EPN 8/8A. Standby operating conditions are herein defined as when no process blowers are in operation on any blowing still venting to the direct-flame incinerator. (8/10)
- E. After issuance of the amended permit, the permit holder is allowed to conduct stack sampling of the direct-flame incinerator during normal operations at an average temperature lower than 1450°F to demonstrate compliance with the MAERT limits for VOC from EPN 8/8A. Upon demonstration of compliance with the MAERT limits for VOC, the permit holder shall submit a permit action to modify the temperature requirement of the direct-flame incinerator during Normal Operations. (8/10)
- F. The maximum allowable asphalt throughput rates are 32,063 pounds per hour for Line 1 and 53,438 pounds per hour for Line 3. (8/10)
- G. The maximum allowable production rates for both Line 1 and Line 3, combined, are 171 tons per hour and 1,498,000 tons per year of finished shingles. (8/10)
- 10. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
- 11. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible PM emissions to maintain compliance with all TCEQ rules and regulations.
- 12. All stacks associated with the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. All stacks associated with the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level. (8/10)

SPECIAL CONDITIONS

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13. There shall be no changes in representations unless the permit is altered or amended. (8/10)

CONTINUOUS DETERMINATION OF COMPLIANCE

14. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions that exceed the specified opacity limits, the holder of this permit may be required to conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowable emissions specified in the MAERT. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with applicable EPA CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. (8/10)
15. The TCEQ Executive Director may require the permit holder to perform stack sampling or ambient air monitoring to determine the opacity, rate, composition, and/or concentration of the plant's emissions. The holder of this permit may request the TCEQ Executive Director to approve alternate sampling techniques or other means to determine the opacity, rates, composition, and/or concentration of emissions in accordance with 30 TAC § 101.8. (8/10)
16. All stack sampling shall be conducted within 60 days of being informed that testing is required, and it shall meet all requirements specified in the Sampling Requirements section of this permit's special conditions. (8/10)
17. For any asphalt storage tank and storage silo and mineral handling facility, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the corresponding opacity limit, the permit holder shall report a deviation. (8/10)



## SPECIAL CONDITIONS

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18. For any blowing still, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation. (8/10)
19. The temperature in the combustion chamber or immediately downstream of the combustion chamber of the direct-flame incinerator shall be measured and recorded four times per hour with an averaging period of one hour. The permit holder shall establish a minimum combustion temperature using the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation. (8/10)

## SAMPLING REQUIREMENTS

20. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling ports and platforms shall be installed on the exhaust stack according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.

SPECIAL CONDITIONS

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21. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during compliance testing, then the production/throughput rates or other parameters may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates. (8/10)
22. A pretest meeting concerning any required stack sampling and/or ambient air monitoring shall be held with personnel from the appropriate TCEQ Regional Office before the required tests are performed. Air contaminants to be tested for and the test methods to be used shall be determined at this pretest meeting.

The TCEQ Regional Office shall be notified no less than 45 days prior to sampling to schedule a pretest meeting. The notice to the TCEQ Regional Office shall include:

- A. Date for pretest meeting;
- B. Date sampling will occur;
- C. Name of firm conducting sampling;
- D. Type of sampling equipment to be used; and
- E. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

23. Air contaminants to be tested for may include (but are not limited to) PM, CO, SO<sub>2</sub>, NO<sub>x</sub>, and VOC.
24. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.
25. The sampling report shall include the following: (8/10)
  - A. Plant production and throughput rates during tests; and
  - B. Direct-flame incinerator operating temperature during tests.

## SPECIAL CONDITIONS

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26. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows: **(8/10)**

One copy to the TCEQ Dallas/Fort Worth Regional Office; and  
One copy to each appropriate local air pollution control program.

27. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Permitting and Registration, Air Permits Division.

## RECORDKEEPING REQUIREMENTS

28. In addition to the recordkeeping requirements specified in General Condition No. 7, 40 CFR Part 60, Subparts A, Dc, and UU, and 40 CFR Part 63, Subparts A and AAAAAAA, the following records shall be kept and maintained on-site for a rolling 60-month period: **(8/10)**

- A. Records of the exhaust gas temperature immediately downstream of the direct-flame incinerator to demonstrate compliance with 30 TAC § 115.126(1)(A)(i). These records shall be maintained on-site for at least five years;
- B. Records of either VOC concentration or mass emission rate of each vent gas stream for the Line 1 and Line 3 Cooling Sections at maximum actual operating conditions to demonstrate compliance with 30 TAC § 115.126(4). These records shall be maintained on-site for at least five years;
- C. Hourly asphalt throughput rates for Line 1 and for Line 3;
- D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles;
- E. Hours of operation for the Standby Boiler;
- F. Records of asphalt stored and used, that have the potential to emit Hazardous Air Pollutants [HAP], shall be kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HAPs (in tons per year) over the previous 12 consecutive months;
- G. Records of repairs and maintenance of all pollution abatement equipment;

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- H. Records of road cleaning, application of road dust control, or road maintenance for dust control; and
- I. All monitoring data and support information as specified in 30 TAC § 122.144.

Dated: August 20, 2010

# EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hr	TPY
STILLYARD OPERATION				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO <sub>x</sub>	0.10	0.43
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO <sub>x</sub>	3.73	0.90
		SO <sub>2</sub>	0.02	<0.01
		PM <sub>10</sub>	0.28	0.07
		CO	3.13	0.75
		VOC	0.20	0.05
8/8A	Direct-flame Incinerator Exhaust Stack/Incinerator Exhaust through Waste Heat Boiler Stack	NO <sub>x</sub>	1.90	8.31
		SO <sub>2</sub>	29.35	128.55
		PM <sub>10</sub>	2.62	11.46
		CO	11.34	49.65
		VOC	0.09	0.37

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hr	TPY
WHBLR1	Waste Heat Recovery Boiler, Natural Gas Burner Side	NO <sub>x</sub>	0.47	2.06
		SO <sub>2</sub>	0.01	0.04
		PM <sub>10</sub>	0.11	0.48
		CO	1.24	5.43
		VOC	0.08	0.35
COMMON TO LINE 1 AND LINE 3				
CFL/34	Coalescing Filter Mist Elimination Systems Stack (to control emissions from the Line 1 and Line 3 Asphalt Coaters) with ESP as backup	PM <sub>10</sub>	0.63	2.76
		VOC	5.76	25.23
LINE 1 OPERATION				
1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM <sub>10</sub>	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM <sub>10</sub>	0.03	0.13
1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	PM <sub>10</sub>	0.59	2.58
1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	PM <sub>10</sub>	0.59	2.58
1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	PM <sub>10</sub>	0.59	2.58
COOL1 (total 3 stks)	Line 1 Cooling Section	PM <sub>10</sub>	8.52	37.30
		VOC	1.65	7.23

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hr	TPY
LINE 3 OPERATION				
25	Sand Application Baghouse	PM <sub>10</sub>	1.50	6.57
26A	Stabilizer Storage Baghouse A	PM <sub>10</sub>	0.15	0.70
26B	Stabilizer Storage Baghouse B	PM <sub>10</sub>	0.29	1.26
27	Stabilizer Heater Baghouse	PM <sub>10</sub>	0.09	0.40
28	Asphalt Heater	NO <sub>x</sub>	0.59	2.60
		SO <sub>2</sub>	<0.01	0.02
		PM <sub>10</sub>	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10
FUG1	Plant-wide Fugitive Emissions (4)	PM <sub>10</sub>	0.91	3.97
		VOC	0.43	1.88
COOL3 (total 3 stks)	Line 3 Cooling Section	PM <sub>10</sub>	6.74	29.52
		VOC	2.76	12.09
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.60	2.58
		SO <sub>2</sub>	0.01	0.02
		PM <sub>10</sub>	0.05	0.20
		CO	0.49	2.16
		VOC	0.03	0.14
All sources (site-wide)	Various	Single HAP	--	<10
		Aggregate HAP	--	<25

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
- (3)
  - NO<sub>x</sub> - total oxides of nitrogen
  - SO<sub>2</sub> - sulfur dioxide
  - PM<sub>10</sub> - particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>
  - PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter
  - CO - carbon monoxide
  - VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
  - HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
- (4) Fugitive emissions are an estimate only.

Dated: August 20, 2010



**CID Item Protestant List**

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Item  
 Number 66703 TCEQ Docket Number 2010-0896-AIR Status ACTIVE HB 801 YES  
 Program AIRNSR ID Type PERMIT Additional ID 7711A \*  
 Regulated Entity GAF MATERIALS  
 Reference No RN100788959  
 Principal BUILDING MATERIALS CORPORATION OF AMERICA  
 Reference No CN602717464

**Protestants**

Request Type	Leg Name	Date
MAILING LIST ADD	HUNTER,DAVID	02/13/2009
HEARING REQUEST	HUNTER,DAVID	02/13/2009

**Totals by Request Type**

Request Type	Total
HEARING REQUEST	1
MAILING LIST ADD	1
	0

**Total Number of Protestants 2**

Print the current window

**CID Item Protestant List**

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**Item**  
**Number** 17135 **TCEQ Docket Number** **Status** CLOSED **HB 801** YES  
**Program** AIRNSR **ID Type** ACC NUM **Additional ID** DB0378S \*  
**Regulated Entity** GAF MATERIALS  
**Reference No** RN100788959  
**Principal** GAF BUILDING MATERIALS CORP  
**Reference No** CN601108897

**Protestants**

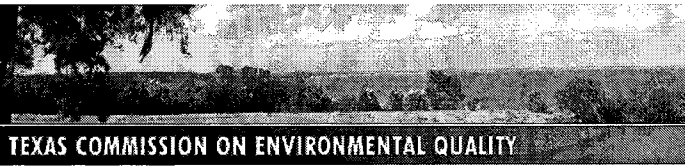
Request Type	Leg Name	Date
WITHDRAWAL - HEARING REQU	UPHOFF, IRVIN A	10/11/2002
PUBLIC MEETING - REQUEST	UPHOFF, IRVIN A	11/14/2000
HEARING REQUEST	UPHOFF, IRVIN A	11/17/2000
HEARING REQUEST	UPHOFF, IRVIN A	11/15/2000
COMMENT - WRITTEN	MAGEE, LINDA	11/13/2000

**Totals by Request Type**

Request Type	Total
HEARING REQUEST	2
WITHDRAWAL - HEARING REQU	1
PUBLIC MEETING - REQUEST	1
COMMENT - WRITTEN	1
	0

**Total Number of Protestants 2**

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## Report Results 1 of 1

<b>Applicant/Respondent Name, TCEQ Customer Number:</b> BUILDING MATERIALS CORPORATION OF AMERICA, CN602717464		<b>Status:</b> ACTIVE <b>Item Type:</b> AMENDMENT																																																																									
<b>Regulated Entity Name, Regulated Entity Number:</b> GAF MATERIALS, RN100788959																																																																											
<b>TCEQ Docket Num:</b> 2010-0896-AIR <b>SOAH Docket Num:</b> 582-10-5031 <b>County, TCEQ Region:</b> DALLAS, REGION 04 - DFW METROPLEX		<b>Program:</b> AIRNSR <b>Permit Number:</b> 7711A <b>Program:</b> AIRNSR <b>Permit Number:</b> DB0378S																																																																									
<b>Doc. Type:</b> PERMIT																																																																											
<b>Protestant Information</b> Note: Allow up to five or more business days after the end of the comment period for comments or hearing requests to be included in this total. <b>Comments Received: 0   Hearing Requests Received: 1   Public Meetings Received: 0</b>																																																																											
<b>Activity Action List:</b> <table border="1"> <thead> <tr> <th>Date</th> <th>Document Type</th> <th>Action</th> </tr> </thead> <tbody> <tr><td>08/16/2010</td><td>SOAH HEARING</td><td>SCHEDULED</td></tr> <tr><td>08/13/2010</td><td>RESPONSE TO COMMENTS</td><td>ROUTED</td></tr> <tr><td>08/12/2010</td><td><u>RESPONSE TO COMMENTS</u></td><td>RECEIVED</td></tr> <tr><td>08/04/2010</td><td>RECORD FOR SOAH</td><td>ROUTED</td></tr> <tr><td>07/30/2010</td><td>SOAH AFFIDAVIT</td><td>RECEIVED</td></tr> <tr><td>07/30/2010</td><td>NEWSPAPER TEARSHEET</td><td>RECEIVED</td></tr> <tr><td>07/06/2010</td><td><u>NOTICE OF SOAH HEARING</u></td><td>MAILED</td></tr> <tr><td>06/02/2010</td><td>DIRECT REFERRAL - APPLIC</td><td>RECEIVED</td></tr> <tr><td>05/06/2010</td><td>AVAILABILITY VERIFICATION</td><td>RECEIVED</td></tr> <tr><td>05/06/2010</td><td>BILINGUAL VERIFICATION</td><td>RECEIVED</td></tr> <tr><td>04/12/2010</td><td>COMMENT PERIOD</td><td>END</td></tr> <tr><td>03/23/2010</td><td>NEWSPAPER TEARSHEET</td><td>RECEIVED</td></tr> <tr><td>03/23/2010</td><td>BILINGUAL AFFIDAVIT</td><td>RECEIVED</td></tr> <tr><td>03/23/2010</td><td>BILINGUAL TEARSHEET</td><td>RECEIVED</td></tr> <tr><td>03/23/2010</td><td>AFFIDAVIT - NAPD</td><td>RECEIVED</td></tr> <tr><td>03/11/2010</td><td>NOTICE - PRELIM DECISION</td><td>PUBLISHED</td></tr> <tr><td>03/11/2010</td><td>BILINGUAL NOTICE</td><td>PUBLISHED</td></tr> <tr><td>02/09/2010</td><td><u>NOTICE - PRELIM DECISION</u></td><td>MAILED</td></tr> <tr><td>02/08/2010</td><td>NOTICE - PRELIM DECISION</td><td>RECEIVED</td></tr> <tr><td>02/08/2010</td><td>NOTICE - PRELIM DECISION</td><td>ISSUED</td></tr> <tr><td>02/19/2009</td><td>AFFIDAVIT - NORI</td><td>RECEIVED</td></tr> <tr><td>02/19/2009</td><td>BILINGUAL TEARSHEET</td><td>RECEIVED</td></tr> <tr><td>02/19/2009</td><td>BILINGUAL AFFIDAVIT</td><td>RECEIVED</td></tr> </tbody> </table>				Date	Document Type	Action	08/16/2010	SOAH HEARING	SCHEDULED	08/13/2010	RESPONSE TO COMMENTS	ROUTED	08/12/2010	<u>RESPONSE TO COMMENTS</u>	RECEIVED	08/04/2010	RECORD FOR SOAH	ROUTED	07/30/2010	SOAH AFFIDAVIT	RECEIVED	07/30/2010	NEWSPAPER TEARSHEET	RECEIVED	07/06/2010	<u>NOTICE OF SOAH HEARING</u>	MAILED	06/02/2010	DIRECT REFERRAL - APPLIC	RECEIVED	05/06/2010	AVAILABILITY VERIFICATION	RECEIVED	05/06/2010	BILINGUAL VERIFICATION	RECEIVED	04/12/2010	COMMENT PERIOD	END	03/23/2010	NEWSPAPER TEARSHEET	RECEIVED	03/23/2010	BILINGUAL AFFIDAVIT	RECEIVED	03/23/2010	BILINGUAL TEARSHEET	RECEIVED	03/23/2010	AFFIDAVIT - NAPD	RECEIVED	03/11/2010	NOTICE - PRELIM DECISION	PUBLISHED	03/11/2010	BILINGUAL NOTICE	PUBLISHED	02/09/2010	<u>NOTICE - PRELIM DECISION</u>	MAILED	02/08/2010	NOTICE - PRELIM DECISION	RECEIVED	02/08/2010	NOTICE - PRELIM DECISION	ISSUED	02/19/2009	AFFIDAVIT - NORI	RECEIVED	02/19/2009	BILINGUAL TEARSHEET	RECEIVED	02/19/2009	BILINGUAL AFFIDAVIT	RECEIVED
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02/05/2009	BILINGUAL NOTICE	PUBLISHED
01/15/2009	NOTICE OF RECEIPT/INTENT	MAILED
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01/14/2009	ADMIN REVIEW	COMPLETE
12/19/2008	APPLICATION	RECEIVED

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## Permit Amendment Source Analysis & Technical Review

Company	Building Materials Corporation of America	Permit Number	7711A
City	Dallas	Project Number	143272
County	Dallas	Account Number	DB-0378-S
Project Type	Amend	Regulated Entity Number	RN100788959
Project Reviewer	Mr. Javier Galván, P.E.	Customer Reference Number	CN602717464
Site Name	Asphalt Processing and Asphalt Roofing Manufacturing Plant		

### Project Overview

Building Materials Corporation of America dba GAF Materials Corporation (GAF) has requested several changes to its existing NSR permit, some as a result of stack testing of various facilities, through an air quality permit amendment. One hearing request from a member of the general public was submitted to the TCEQ during the first public notice comment period which was unresolved by GAF; therefore, a second public notice was performed by GAF.

There are no proposed production rate increases, physical modifications to existing facilities, or new construction of facilities associated with this permit amendment application. GAF has requested to increase asphalt throughput rates for Lines 1 and 3. On September 19, 2008 GAF entered into a proposed Agreed Order, Docket Number 2008-0805-AIR-E, to resolve deviations that resulted from stack testing. This amendment application is the result of that Agreed Order, and emission increases requested by GAF are based on the stack test results. Standard Permit Registration No. 81652 was consolidated by incorporation into this air quality permit. BACT was evaluated and determined to be consistent with current requirements. The standard permit, issued on May 8, 2007, authorized the company to replace the Lines 1 and 3 asphalt coaters ESP with two coalescing filter mist elimination systems for improved control of PM/PM<sub>10</sub>. A contested case hearing was requested by a member of the general public. GAF's legal counsel requested direct referral of the matter to SOAH. No persons appeared for the preliminary hearing with SOAH held on August 16, 2010. The ED moved that the Administrative Law Judge (ALJ) remand the application to the ED to be processed as an uncontested matter.

### Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM <sub>10</sub>	119.41	103.84	-15.57
VOC	48.82	47.48	-1.34
NO <sub>x</sub>	28.47	17.32	-11.15
CO	26.76	60.91	34.15
SO <sub>2</sub>	3.37	128.67	125.29
HAPs	<i>not previously quantified</i>	15.12	

### Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	April 29, 2009
Compliance period:	December 19, 2008 - December 19, 2003
Site rating & classification:	0.4/Average
Company rating & classification:	1.36/Average
Has the permit changed on the basis of the compliance history or rating?	No

### Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement
39.403	Is Public Notice Required? <span style="float: right;">Yes</span>
	Date Application Received: <span style="float: right;">December 19, 2008</span>
	Date Administratively Complete: <span style="float: right;">January 14, 2009</span>

# Permit Amendment Source Analysis & Technical Review

Permit No. 7711A  
Page 2

Regulated Entity No. RN100788959

Rule Citation	Requirement
	Small Business Source? No
	Date Leg Letters mailed: January 14, 2009
39.603	Date Published: February 5, 2009
	Publication Name: Dallas Observer
	Pollutants: PM including PM <sub>10</sub> , SO <sub>2</sub> , organic compounds, CO, and NO <sub>x</sub>
	Date Affidavits/Copies Received: February 19, 2009
	Is bilingual notice required? Yes
	Language: Spanish
	Date Published: February 5, 2009
	Publication Name: El Extra Spanish Newspaper
	Date Affidavits/Copies Received: February 19, 2009
	Date Certification of Sign Posting / Application Availability Received: March 13, 2009
39.604	Public Comments Received? Yes
	Hearing Requested? Yes
	Meeting Requested? No
	Date Meeting Held: N/A
	Date Response to Comments sent to OCC: August 12, 2010
	Request(s) withdrawn? No - no persons appeared for preliminary hearing with SOAH; ED moved that the ALJ remand the application to the ED to be processed as uncontested matter.
	Date Withdrawn: N/A
	Consideration of Comments: N/A
	Is 2nd Public Notice required? Yes
39.419	Date 2nd Public Notice Mailed: February 8, 2010
	Preliminary Determination: Issue
39.603	Date Published: March 11, 2010
	Publication Name: Dallas Observer
	Pollutants: PM including PM <sub>10</sub> and PM <sub>2.5</sub> , SO <sub>2</sub> , VOC, CO, NO <sub>x</sub>
	Date Affidavits/Copies Received: March 23, 2010
	Is bilingual notice required? Yes
	Language: Spanish
	Date Published: March 11, 2010
	Publication Name: El Extra Spanish Language Newspaper
	Date Affidavits/Copies Received: March 23, 2010
	Date Certification of Sign Posting / Application Availability Received: April 23, 2010
	Public Comments Received? No
	Meeting Requested? No
	Date Meeting Held: N/A
	Hearing Requested? No
	Date Hearing Held: N/A
	Request(s) withdrawn? N/A
	Date Withdrawn: N/A

# Permit Amendment Source Analysis & Technical Review

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Regulated Entity No. RN100788959

Rule Citation	Requirement	
	Consideration of Comments:	N/A
39.421	Date RTC, Technical Review & Draft Permit Conditions sent to OCC:	August 12, 2010
	Request for Reconsideration Received?	No
	Final Action:	Issue
	Are letters Enclosed?	No

## Construction Permit & Amendment Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.111(a)(2)(G)	Is the facility expected to perform as represented in the application?	Yes
116.111(a)(2)(A)(i)	Are emissions from this facility expected to comply with all TCEQ air quality Rules & Regulations, and the intent of the Texas Clean Air Act?	Yes
116.111(a)(2)(B)	Emissions will be measured using the following method:	recordkeeping and stack testing
116.111(a)(2)(D)	Subject to NSPS?	Yes
	Subparts A, Dc & UU	
116.111(a)(2)(E)	Subject to NESHAP?	No
116.111(a)(2)(F)	Subject to NESHAP (MACT) for source categories?	Yes
	Subparts A & AAAAAAA	
116.111(a)(2)(H)	Is nonattainment review required?	No
	Is the site located in a nonattainment area?	Yes
	Is the site a federal major source for a nonattainment pollutant?	No
	Is the project a federal major source for a nonattainment pollutant by itself?	No
	Is the project a federal major modification for a nonattainment pollutant?	No
116.111(a)(2)(I)	Is PSD applicable?	No
	Is the site a federal major source (100/250 tons/yr)?	No
	Is the project a federal major source by itself?	No
	Is the project a federal major modification?	No
116.111(a)(2)(L)	Is Mass Emissions Cap and Trade applicable to the new or modified facilities?	No
116.140 - 141	Permit Fee: \$ 900.00	Fee certification: R911983

## Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement	
122.10(13)(A)	Is the site a major source under FCAA Section 112(b)?	Yes
	Does the site emit 10 tons or more of any single HAP?	No
	Does the site emit 25 tons or more of a combination?	No
122.10(13)(C)	Does the site emit 100 tons or more of any air pollutant?	Yes
122.10(13)(D)	Is the site a non-attainment major source?	No
122.602	Periodic Monitoring (PM) applicability:	Yes
	Monitor temperature of incinerator four times per hour with an averaging period of one hour. Monitor visible emissions once per week of blowing stills, of storage tanks, and of mineral handling and storage facilities.	
122.604	Compliance Assurance Monitoring (CAM) applicability:	N/A

## Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	4	NA	none received
City:	Dallas	Brian Cunningham	none

**Permit Amendment**  
**Source Analysis & Technical Review**

Permit No. 7711A  
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Regulated Entity No. RN100788959

**Process Description**

The plant manufactures asphalt shingles for the roofing industry. A dry, nonwoven fiberglass mat is fed into the roofing machine from an unwind stand. The fiberglass is carried through the coating section where coating asphalt mixed with a stabilizer (limestone) is applied to both surfaces of the mat. The coating operation is followed by the surfacing section. Ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and itself in the finished package. The hot sheet, with a mineralized surface, then goes into the cooling section of the machine. Cooling is accomplished by passing the web over a series of water-cooled drums, through water mist sprays and between air jets. It is then accumulated in the looper section of the machine to provide surge capacity required prior to cutting. Self-seal striping dots are then applied and the sheet is cut into shingles and automatically packaged. The boiler accepts the thermal oxidizer exhaust gas for preheating recovery and fires as necessary to meet the steam needs of the plant.

**Project Description**

The changes requested by GAF are as follows:

1. Increase the following permit allowables based on stack test results obtained in April, 2008:
  - PM<sub>10</sub> for EPN COOL3;
  - (combined) SO<sub>2</sub>, NO<sub>x</sub>, and CO for EPNs 8 and 8A;
  - PM<sub>10</sub> for EPN COOL1.
2. Update/correct permit representations to include on the MAERT the existence of the two sides/stacks of the waste heat recovery boiler: the waste heat recovery boiler stack (EPN 8A) and the waste heat recovery boiler natural gas burner stack (EPN WHBLR1).
3. Correct current permit representation for Tanks T-1 and T-2 Laminating Adhesive Tanks, which will not affect proposed permit allowables since the stack test on EPN 8 accounted for the routing of emissions from Tanks T-1 and T-2 to the direct-flame incinerator.
4. Decrease the following permit allowables based on stack test results:
  - PM<sub>10</sub> for EPN CFL;
  - PM<sub>10</sub> for EPN 25;
  - (combined) PM<sub>10</sub> for EPNs 8 and 8A;
  - SO<sub>2</sub>, NO<sub>x</sub>, CO, PM<sub>10</sub>, and VOC for EPN BLR5.
5. In addition to EPN CECO 1, remove from the NSR permit the following EPNs:
  - 98, the Rail 2 Stack;
  - HTR1, the Line 1 Stabilizer Thermal Fluid Heater Vent;
  - HTR2, the Line 1 Thermal Fluid Heater Vent;
  - 30, the Hot Oil Heater Vent (Thermal Fluid Heater).
6. Consolidate by incorporation into this permit SP Registration No. 81652.
7. Add a federally enforceable limit on the operational hours of the standby boiler (EPN BLR5). The standby boiler is used for back-up purposes only, and GAF has requested a limit of 480 hours per year.

**Pollution Prevention, Sources, Controls and BACT- [30 TAC 116.111(a)(2)(C)]**

The following are sources of emissions at the site: all heaters, the boiler and the standby boiler, all storage and process tanks, blowing stills, and all loading and unloading operations associated with trucks and railcars.

**NSPS Requirements**



# Permit Amendment Source Analysis & Technical Review

Permit No. 7711A  
Page 5

Regulated Entity No. RN100788959

## NSPS Requirements

Emission Unit	Proposed Method of Control	NSPS Subpart UU Standard
asphalt storage & process tanks	direct-flame incinerator	zero percent opacity limitation at all times
blowing stills	direct-flame incinerator	1.2 pounds of PM per ton of asphalt
Emission Unit	Proposed Method of Control	NSPS Subpart Dc Standard
standby boiler	no abatement device	no PM or SO <sub>2</sub> standards
waste heat recovery boiler	no abatement device	no PM or SO <sub>2</sub> standards

## MACT Standards/Requirements

Emission Unit	Proposed Method of Control	MACT Subpart AAAAAAA Standard
blowing stills	direct-flame incinerator	1.2 pounds of PM per ton of asphalt charged to the blowing stills
asphalt coaters	high-energy air filters	0.06 pounds of PM per ton of asphalt roofing product manufactured

The company has represented that the cause for the increase in SO<sub>2</sub> emissions is that it purchases its raw material, asphalt flux, from oil refineries. As a result of the 1997 Low Sulfur Diesel Fuel requirements, the extra sulfur is removed from the fuel and moved to the waste stream. Based on representations made by the company, the suppliers of this asphalt flux vary based on economics, and each refinery has a different by-product stream of which the constituents of the waste stream vary.

A review of the RBLC for asphalt processing and asphalt roofing plants resulted in one plant located in Ohio. This plant is authorized to emit a total of 247.19 tons per year of SO<sub>2</sub> from a thermal incinerator, three asphalt blowing stills/convertors, two asphalt loading racks, and three oxidized asphalt fixed-roof storage tanks (other permitted facilities may exist at the site, but these were the only facilities listed.) Emissions from the blowing stills, loading racks, and storage tanks vent to two distinct thermal incinerators. The listed thermal incinerator has a destruction efficiency of 95 percent for PM/PM<sub>10</sub>, H<sub>2</sub>S, CO, and VOC. No abatement device or method was listed for capture and reduction of SO<sub>2</sub> from the listed facilities at the site. All permitted facilities will meet BACT criteria for asphalt processing and asphalt roofing manufacturing facilities.

## Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted?	Yes	Type of Modeling:	AERMOD version 07026
Will GLC of any air contaminant cause violation of NAAQS?	No		
Is this a sensitive location with respect to nuisance?	Yes		
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?	Yes		

## Summary of Modeling Results and Air Quality Analysis

	Averaging Period:	GLC <sub>max</sub> :	SIL:	Background Conc.:	Total Conc.:	NAAQS:	TCEQ Standard:
PM <sub>10</sub>	24-hour	68	5	56	124	150	
	Annual	18	1	30	48	50	
NO <sub>2</sub>	1-hour	83	10*	103	186	188	
	Annual	14	1	30	44	100	
CO	1-hour	622	2,000		622	40,000	
	8-hour	335	500		335	10,000	

# **Permit Amendment** **Source Analysis & Technical Review**

Permit No. 7711A  
Page 6

Regulated Entity No. RN100788959

SO <sub>2</sub>	1-hour	676			676		1,021
	3-hour	532	25	24	556	1,300	
	24-hour	329	5	13	342	365	
	Annual	39	1	3	42	80	


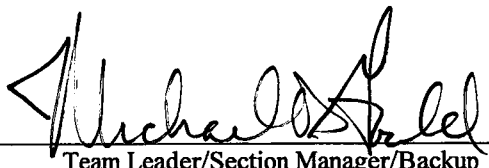
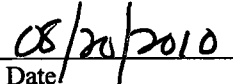
Averaging Period: GLC<sub>max</sub>: TCEQ ESL:

Asphalt vapors	1-hour	336	350
	Annual	25	35

The PM<sub>10</sub> NAAQS evaluation was used as a surrogate for the determination of compliance with the PM<sub>2.5</sub> NAAQS. Currently there are no PM<sub>2.5</sub> emission factors available for this industry. PM<sub>10</sub> and SO<sub>2</sub> background concentrations were obtained from monitoring data for Dallas County using the most complete, recent year (2006) that had the highest, or equal to the highest, values. NO<sub>2</sub> data were obtained from meteorological datasets of 1985 and 1987-1990. The company used a three-year average of the 98<sup>th</sup> percentile of the annual distribution of daily maximum 1-hour concentrations from 2007-2009. A NO<sub>x</sub> to NO<sub>2</sub> ratio of 0.75 was applied to the modeled NO<sub>x</sub> emission rates. \*Refer to modeling audit report, July 27, 2010.

## **Permit Concurrence and Related Authorization Actions**

Is the applicant in agreement with special conditions?	<b>Yes</b>
Company representative(s):	<b>Latha Kambham, Ph.D., Trinity Consultants</b>
Contacted Via:	<b>e-mail</b>
Date of contact:	<b>January 8, 2010</b>
Other permit(s) or permits by rule affected by this action:	<b>Yes</b>
List permit and/or PBR number(s) and actions required or taken:	<b>SP Registration No. 81652 will be voided upon approval of this amended NSR permit.</b>

		
Project Reviewer	Team Leader/Section Manager/Backup	Date
8.20.10		08/20/2010

**SOAH DOCKET NO. 582-10-5031  
DOCKET NO. 2010-0896-AIR**

**APPLICATION OF BUILDING  
MATERIALS CORPORATION OF  
AMERICA ASPHALT ROOFING  
PRODUCTION FACILITY,  
DALLAS COUNTY**

§  
§  
§  
§  
§

**BEFORE THE STATE OFFICE**

**OF**

**ADMINISTRATIVE HEARINGS**

**ORDER NO. 1**

On August 16, 2010, the Administrative Law Judge (ALJ) convened a preliminary hearing in Austin, Texas regarding the above-referenced application. The Applicant, Building Materials Corporation of America, and the Executive Director (ED) were present at the preliminary hearing. No other persons were present. The ED offered the following exhibits into evidence:

Exhibit A:	Notice of Hearing
Exhibit B:	July 28, 2010 letter, including Affidavit of Publication of Notice of Hearing
Exhibit C:	ED's Response to Comments

There were no objections to admission of these three exhibits and the ALJ admitted them into evidence. Based on these exhibits, the ALJ concluded that notice was sufficient.

Since no persons were present seeking to be named as a protesting party, the ED moved that the ALJ remand this application to the ED to be processed as an uncontested matter. The ALJ agrees with the ED's motion.

Therefore, it is **ORDERED** that this matter is **REMANDED** to the ED for further processing and this case is **DISMISSED** from the docket of the State Office of Administrative Hearings.

Issued: August 16, 2010

  
\_\_\_\_\_  
**KERRIE JO QUALTROUGH  
ADMINISTRATIVE LAW JUDGE  
STATE OFFICE OF ADMINISTRATIVE HEARINGS**

**STATE OFFICE OF ADMINISTRATIVE HEARINGS****AUSTIN OFFICE****300 West 15th Street Suite 502****Austin, Texas 78701****Phone: (512) 475-4993****Fax: (512) 475-4994****SERVICE LIST**

**AGENCY:** Environmental Quality, Texas Commission on (TCEQ)  
**STYLE/CASE:** BUILDING MATERIALS CORP OF AMERICA  
**SOAH DOCKET NUMBER:** 582-10-5031  
**REFERRING AGENCY CASE:** 2010-0896-AIR

**STATE OFFICE OF ADMINISTRATIVE  
HEARINGS****ADMINISTRATIVE LAW JUDGE  
ALJ KERRIE QUALTROUGH****REPRESENTATIVE / ADDRESS****PARTIES**

BLAS J. COY, JR.  
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(512) 239-6377 (FAX)  
bc coy@tceq.state.tx.us

**OFFICE OF PUBLIC INTEREST COUNSEL**

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**BUILDING MATERIALS CORPORATION OF AMERICA**

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**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

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BUILDING MATERIALS CORPORATION OF AMERICA

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xc: Docket Clerk, State Office of Administrative Hearings

**STATE OFFICE OF ADMINISTRATIVE HEARINGS****AUSTIN OFFICE****300 West 15th Street Suite 502****Austin, Texas 78701****Phone: (512) 475-4993****Fax: (512) 475-4994****DATE:****08/16/2010****NUMBER OF PAGES INCLUDING THIS COVER SHEET:****4****REGARDING:****ORDER NO. 1****DOCKET NUMBER:****582-10-5031****JUDGE KERRIE QUALTROUGH****FAX TO:****FAX TO:****ROD JOHNSON (BROWN MCCARROLL L.L.P.)****(512) 479-1101****DANNY G WORRELL****(512) 479-1101****BLAS J. COY, JR. (TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY)****(512) 239-6377****ERIN SELVERA (TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY)****(512) 239-0606****TCEQ Docket Clerk, Fax Number 512/239-3311****NOTE: IF ALL PAGES ARE NOT RECEIVED, PLEASE CONTACT LISA MARTINEZ(lma) (512) 475-4993**

The information contained in this facsimile message is privileged and confidential information intended only for the use of the above-named recipient(s) or the individual or agent responsible to deliver it to the intended recipient. You are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone, and return the original message to us at the address via the U.S. Postal Service. Thank you.



**Texas Commission on Environmental Quality  
Form PI-1 General Application for  
Air Preconstruction Permit and Amendments**

**Update:** The TCEQ requires that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued by the TCEQ and no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TCEQ Web site at [www.tceq.state.tx.us/permitting/central\\_registry/guidance.html](http://www.tceq.state.tx.us/permitting/central_registry/guidance.html).

<b>I. APPLICANT INFORMATION</b>		
A. Company or Other Legal Name: Building Materials Corporation of America		
Texas Secretary of State Charter/Registration Number (if applicable):		
B. Company Official Contact Name: David Fuelleman		
Title: Plant Manager		
Mailing Address: 2600 Singleton Blvd.		
City: Dallas	State: TX	Zip Code: 75212
Telephone No: 214-637-1060	Fax No.: 214-637-5202	E-mail Address: dfuelleman@gaf.com
C. Technical Contact Name: Doug Harris		
Title: Plant Engineer		
Company Name: Building Materials Corporation of America		
Mailing Address: 2600 Singleton Blvd.		
City: Dallas	State: TX	Zip Code: 75212
Telephone No.: 214-637-8909	Fax No.: 214-637-5202	E-mail Address: dharris@gaf.com
D. Facility Location Information:		
Street Address: 2600 Singleton Blvd		
If no street address, provide clear driving directions to the site in writing:		
City: Dalls	County: Dallas	Zip Code: 75212
E. TCEQ Account Identification Number (leave blank if new site or facility): DB-0378-S		
F. Is a TCEQ Core Data Form (TCEQ Form No. 10400) attached?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. TCEQ Customer Reference Number (leave blank if unknown): 602717464		
H. TCEQ Regulated Entity Number (leave blank if unknown): 100788959		
<b>II. IMPORTANT GENERAL INFORMATION</b>		
A. Is confidential information submitted with this application?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," is each "confidential" page marked "CONFIDENTIAL" in large red letters?		<input type="checkbox"/> YES <input type="checkbox"/> NO



**Texas Commission on Environmental Quality**  
**Form PI-1 General Application for**  
**Air Preconstruction Permit and Amendments**

<b>II. IMPORTANT GENERAL INFORMATION (continued)</b>										
B. Is this application in response to a TCEQ investigation or enforcement action? If "YES", attach a copy of any correspondence from the TCEQ		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO								
C. Number of New Jobs: 0										
D. Names of the State Senator and district number for this facility site: Senator Royce West, District 23 Names of State Representative and district number for this facility site: Rep. Terri Hodge, District 100										
E. For Concrete Batch Plants, name of the County Judge for this facility site:										
Mailing Address:										
City:	State:	Zip Code:								
F. For Concrete Batch Plants, is the facility located in a municipality or an extraterritorial jurisdiction of a municipality? If "YES," list the name(s) of the Presiding Officer(s) for this facility site:		<input type="checkbox"/> YES <input type="checkbox"/> NO								
Mailing Address:										
City:	State:	Zip Code:								
<b>III. FACILITY AND SOURCE INFORMATION</b>										
A. Site Name: Dallas Plant										
B. Area Name/Type of Facility: Asphalt Coaters		<input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Portable								
C. Principal Company Product or Business: Manufacture Asphalt Roofing Products Principal Standard Industrial Classification Code: 2952										
D. Projected Start of Construction Date: N/A		Projected Start of Operation Date: N/A								
<b>IV. TYPE OF PERMIT ACTION REQUESTED</b>										
A. Permit Number (if existing): 7711A										
B. Is this an initial permit application?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								
If "YES," check the type of permit requested (check all that apply): <table style="width: 100%; border: none;"><tr><td><input type="checkbox"/> State Permit</td><td><input type="checkbox"/> Nonattainment Federal Permit</td></tr><tr><td><input type="checkbox"/> Flexible Permit</td><td><input type="checkbox"/> Prevention of Significant Deterioration Federal Permit</td></tr><tr><td><input type="checkbox"/> Multiple Plant Permit</td><td><input type="checkbox"/> Hazardous Air Pollutants Permit Federal Clean Air Act § 112(g)</td></tr><tr><td colspan="2">Other: _____</td></tr></table>			<input type="checkbox"/> State Permit	<input type="checkbox"/> Nonattainment Federal Permit	<input type="checkbox"/> Flexible Permit	<input type="checkbox"/> Prevention of Significant Deterioration Federal Permit	<input type="checkbox"/> Multiple Plant Permit	<input type="checkbox"/> Hazardous Air Pollutants Permit Federal Clean Air Act § 112(g)	Other: _____	
<input type="checkbox"/> State Permit	<input type="checkbox"/> Nonattainment Federal Permit									
<input type="checkbox"/> Flexible Permit	<input type="checkbox"/> Prevention of Significant Deterioration Federal Permit									
<input type="checkbox"/> Multiple Plant Permit	<input type="checkbox"/> Hazardous Air Pollutants Permit Federal Clean Air Act § 112(g)									
Other: _____										





**Texas Commission on Environmental Quality  
Form PI-1 General Application for  
Air Preconstruction Permit and Amendments**

<b>IV. TYPE OF PERMIT ACTION REQUESTED (continued)</b>					
<b>C. Is this a permit amendment?</b>  If "YES," check the type of permit requested ( <i>check all that apply</i> ): <input checked="" type="checkbox"/> State Permit Amendment <input type="checkbox"/> Flexible Permit Amendment <input type="checkbox"/> Multiple Plant Permit Amendment <input type="checkbox"/> Nonattainment Major Modification <input type="checkbox"/> Prevention of Significant Deterioration Major Modification <input type="checkbox"/> Hazardous Air Pollutants Permit Federal Clean Air Act § 112(g) Modification Other: _____		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
<b>D. Is a permit renewal application being submitted in conjunction with this amendment in accordance with Senate Bill 1673? [THSC 382.055(a)(2)](80<sup>th</sup> Legislative)</b>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
<b>E. Is this application for a change in location of previously permitted facilities?</b>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
If "YES," answer E. 1. and E. 2.					
<b>1. Current location of facility:</b>  Street Address ( <i>If no street address, provide clear driving directions to the site in writing.</i> ):  <table border="1" style="width: 100%; border-collapse: collapse;"><tr><td style="width: 33%;">City:</td><td style="width: 33%;">County:</td><td style="width: 33%;">Zip Code:</td></tr></table>			City:	County:	Zip Code:
City:	County:	Zip Code:			
<b>2. Will the proposed facility, site, and plot plan meet all current technical requirements of the permit special conditions?</b>  If "NO," attach detailed information.		<input type="checkbox"/> YES <input type="checkbox"/> NO			
<b>F. Are there any standard permits, exemptions or permits by rule to be consolidated into this permit?</b>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
<b>G. Are you permitting a facility or group of facilities that have planned maintenance, startup and shutdown emissions that cannot be authorized by a permit by rule or standard permit or that are authorized by a permit by rule or standard permit and are being rolled into this permit?</b>  If "YES," attach information on any changes to emissions under this application as specified in Section VIII. and Section IX.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
If "YES," answer G. 1 through G. 3.					
<b>1. Are the activities to be included in this permit covered by any previously existing MSS authorizations?</b>  If "YES," provide a listing of all other authorizations (permit by rule or standard permit and the associated registration number if any).		<input type="checkbox"/> YES <input type="checkbox"/> NO			
<b>2. Have the emissions been previously submitted as part of an emissions inventory?</b>		<input type="checkbox"/> YES <input type="checkbox"/> NO			
<b>3. List which years the MSS activities were included in emissions inventory submittals:</b>					



Texas Commission on Environmental Quality  
Form PI-1 General Application for  
Air Preconstruction Permit and Amendments

corrected  
rec'd 1/13

**IV. TYPE OF PERMIT ACTION REQUESTED (continued)**

**H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability)**

☒ YES ☐ NO ☐ To be Determined

Is this facility located at a site required to obtain a federal operating permit under 30 TAC Chapter 122?

1. Identify the requirements of 30 TAC Chapter 122 that will be triggered if this PI-1 application is approved.

☐ FOP Significant Revision ☒ FOP Minor ☐ Application for an FOP Revision

☐ Operational Flexibility/Off-Permit Notification ☐ Streamlined Revision for GOP ☐ To be determined ☐ None

2. Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site (check all that apply)

☒ SOP ☐ GOP ☐ GOP application/revision application: submitted or under APD review

☐ SOP application/revision application: submitted or under APD review ☐ N/A

**V. PERMIT FEE INFORMATION**

A. Fee paid for this application:

\$ 900.00

1. Is a copy of the check or money order attached to the original submittal of this application?

☒ YES ☐ NO ☐ N/A

2. Is a Table 30 entitled, "Certification of estimated Capital Cost and Fee Verification," attached?

☒ YES ☐ NO

**VI. PUBLIC NOTICE APPLICABILITY**

A. Is this a new permit application?

☐ YES ☒ NO

B. Is this an application for a major modification of a PSD, NA or 30 TAC § 112(g) permit?

☐ YES ☒ NO

C. Is this a state permit amendment application?

☒ YES ☐ NO

If "YES," answer C. 1. through C. 3.

1. Is there any change in character of emissions in this application?

☐ YES ☒ NO

Is there a new air contaminant in this application?

☐ YES ☒ NO

2. Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or vegetables fibers (agricultural facilities)?

☐ YES ☒ NO

3. List the total annual emission increases associated with the application (list all that apply):

Volatile Organic Compounds (VOC):	-1.34	tpy	Particulate Matter (PM):	-22.14	tpy
Sulfur Dioxide (SO <sub>2</sub> ):	125.29	tpy	Lead (Pb):		tpy
Carbon Monoxide (CO):	34.15	tpy	Nitrogen oxides (NO <sub>x</sub> ):	-11.15	tpy
Other air contaminants not listed above:		tpy	List:		tpy



**Texas Commission on Environmental Quality**  
**Form PI-1 General Application for**  
**Air Preconstruction Permit and Amendments**

<b>IV. TYPE OF PERMIT ACTION REQUESTED (continued)</b>	
<b>H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability)</b>  Is this facility located at a site required to obtain a federal operating permit under 30 TAC Chapter 122?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> To be Determined
1. Identify the requirements of 30 TAC Chapter 122 that will be triggered if this PI-1 application is approved. <input type="checkbox"/> FOP Significant Revision <input checked="" type="checkbox"/> FOP Minor <input type="checkbox"/> Application for an FOP Revision <input type="checkbox"/> Operational Flexibility/Off-Permit Notification <input type="checkbox"/> Streamlined Revision for GOP <input type="checkbox"/> To be determined <input type="checkbox"/> None	
2. Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site (check all that apply) <input checked="" type="checkbox"/> SOP <input type="checkbox"/> GOP <input type="checkbox"/> GOP application/revision application: submitted or under APD review <input type="checkbox"/> SOP application/revision application: submitted or under APD review <input type="checkbox"/> N/A	
<b>V. PERMIT FEE INFORMATION</b>	
A. Fee paid for this application:	\$ 900.00
1. Is a copy of the check or money order attached to the original submittal of this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. Is a Table 30 entitled, "Certification of estimated Capital Cost and Fee Verification," attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>VI. PUBLIC NOTICE APPLICABILITY</b>	
A. Is this a new permit application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
B. Is this an application for a major modification of a PSD, NA or 30 TAC § 112(g) permit?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
C. Is this a state permit amendment application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If "YES," answer C. 1. through C. 3.	
1. Is there any change in character of emissions in this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Is there a new air contaminant in this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or vegetables fibers (agricultural facilities)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. List the total annual emission increases associated with the application ( <i>list all that apply</i> ): <span style="float: right; font-size: small;">Please see Permit Application, Appendix C</span> Volatile Organic Compounds (VOC): _____ tpy      Particulate Matter (PM): _____ tpy Sulfur Dioxide (SO <sub>2</sub> ): _____ tpy      Lead (Pb): _____ tpy Carbon Monoxide (CO): _____ tpy      Nitrogen oxides (NO <sub>x</sub> ): _____ tpy Other air contaminants not listed above: _____ tpy      List: _____ tpy	



**Texas Commission on Environmental Quality**  
**Form PI-1 General Application for**  
**Air Preconstruction Permit and Amendments**

<b>VI. PUBLIC NOTICE APPLICABILITY</b> <i>(continued)</i>			
D. Is this a change of location application?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," answer D. 1. through D. 3.			
1. Is the new facility site located in or contiguous to the right-of-way of a public works project?			<input type="checkbox"/> YES <input type="checkbox"/> NO
2. Is there a permitted facility occupying the new site?			<input type="checkbox"/> YES <input type="checkbox"/> NO
If "YES," please list the permit number:			
3. Have portable facilities occupied the new site at any time in the last two years?			<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>VII. PUBLIC NOTICE INFORMATION</b> <i>(complete if applicable)</i>			
<b>A. Responsible Person:</b>			
Name: Doug Harris		Title: Plant Engineer	
Mailing Address: 2600 Singleton Blvd.			
City: Dallas		State: TX	Zip Code: 75212
Telephone No.: 214-637-8909		Fax No.: 214-637-5202	E-mail Address: dharris@gaf.com
<b>B. Technical Contact:</b>			
Company Name: Building Materials Corporation of America			
Name: Doug Harris		Title: Plant Engineer	
Mailing Address: 2600 Singleton Blvd.			
City: Dallas		State: TX	Zip Code: 75212
Telephone No.: 214-637-8909		Fax No.: 214-637-5202	E-mail Address: dharris@gaf.com
<b>C. Application in Public Place:</b>			
Name of Public Place: Dallas West Library			
Physical Address: 2332 Singleton Blvd		City: Dallas	County: Dallas
The public place has granted authorization to place the application for public viewing and copying?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. Is a bilingual program required by the Texas Education Code in the School District?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
If yes, which language is required by the bilingual program? Spanish			<input type="checkbox"/> YES <input type="checkbox"/> NO



**Texas Commission on Environmental Quality  
Form PI-1 General Application for  
Air Preconstruction Permit and Amendments**

**VIII. SMALL BUSINESS CLASSIFICATION** *(required)*

- |   |   |
|---|---|
| A. Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| B. Is the site a major source under 30 TAC Chapter 122, Federal Operating Permit Program?   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Are the site emissions of any individual air contaminant greater than 50 tpy?  | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| D. Are the site emissions of all air contaminants combined greater than 75 tpy?   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |

**IX. TECHNICAL INFORMATION**

- |  |   |
|--|---|
| A. Is a current area map attached?   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| Are any schools located within 3,000 feet of this facility?                                    | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Is a plot plan of the plant property attached?  | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Is a process flow diagram and a process description attached?                               | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| D. Maximum Operating Schedule: <u>24</u> Hours/Day <sup>7</sup> Days/Week <u>52</u> Weeks/Year |   |
| Seasonal Operation?  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| If "YES," please describe  |   |
| E. Are worst-case emissions data and calculations attached?                                    | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 1. Is a Table 1(a) entitled, "Emission Point Summary Table," attached?                         | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. Is a Table 2 entitled, "Material Balance Table," attached?                                  | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 3. Are equipment, process, or control device tables attached?                                  | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| F. Are actual emissions for the last two years (determination federal applicability) attached? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

**X. STATE REGULATORY REQUIREMENTS**

*Applicants must be in compliance with all applicable state regulations to obtain a permit or amendment.*

- |   |   |
|---|---|
| A. The emissions from the proposed facility will comply with all rules and regulations of the TCEQ and details are attached?                              | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. The proposed facility will be able to measure emissions of significant air contaminants and details are attached?                                      | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. A demonstration of Best Available Control Technology (BACT) is attached?   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| D. The proposed facilities will achieve the performance in the permit application and compliance demonstration or record keeping information is attached? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| E. Is atmospheric dispersion modeling attached?   | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |



**Texas Commission on Environmental Quality  
Form PI-1 General Application for  
Air Preconstruction Permit and Amendments**

**X. STATE REGULATORY REQUIREMENTS (continued)**

*Applicants must be in compliance with all applicable state regulations to obtain a permit or amendment.*

<b>F.</b> Does this application involve any air contaminants for which a "disaster review" is required? If "YES," details must be attached.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
--	---

*Note: For a list of air contaminants for which a "disaster review" will be required, refer to the NSRPD Disaster Review Guidance Document at [www.tceq.state.tx.us/permitting/air/rules/federal/63/63hmpg.html](http://www.tceq.state.tx.us/permitting/air/rules/federal/63/63hmpg.html).*

<b>G.</b> Is this facility or group of facilities located at a site within the Houston/Galveston nonattainment area? (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, or Waller Counties)	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
--	---

<b>1.</b> Does the facility or group of facilities located at this site have an uncontrolled design capacity to emit 10 tpy or more of NO <sub>x</sub> ?	<input type="checkbox"/> YES <input type="checkbox"/> NO
--	--

<b>2.</b> Is this site subject to 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emissions Cap and Trade)?	<input type="checkbox"/> YES <input type="checkbox"/> NO
--	--

<b>3.</b> Does this action make the site subject to 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emissions Cap and Trade)?	<input type="checkbox"/> YES <input type="checkbox"/> NO
--	--

<b>4.</b> Does this action require the site to obtain additional emission allowances?	<input type="checkbox"/> YES <input type="checkbox"/> NO
---	--

**XI. FEDERAL REGULATORY REQUIREMENTS**

*Applicants must be in compliance with all applicable federal regulations to obtain a permit or amendment. If any of the following questions is answered "YES, the application must contain detailed attachments addressing applicability, identify federal regulation Subparts, show how requirements are met, and include compliance information.*

<b>A.</b> Does a Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to a facility in this application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA
---	---

<b>B.</b> Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to a facility in this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
---	---

<b>C.</b> Does a 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to a facility in this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
---	---

<b>D.</b> Does nonattainment permitting requirements apply to this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
---	---

<b>E.</b> Does prevention of significant deterioration permitting requirements apply to this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
---	---

<b>F.</b> Does Hazardous Air Pollutant Major Source [FAA § 112(g)] requirements apply to this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
--	---

**XII. COPIES OF THIS APPLICATION**

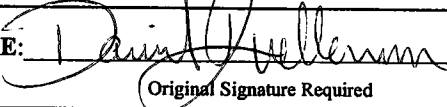
<b>A.</b> Has the required fee been sent separately with a copy of this Form PI-1 to the TCEQ Revenue Section? (MC 214, P.O. Box 13088, Austin, Texas 78711).	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NA
---	---

<b>B.</b> Are the Core Data Form, Form PI-1, and all attachments being sent to the TCEQ in Austin?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
--	---

<b>OPTIONAL:</b> Has an extra copy of the Core Data Form, Form PI-1 and all attachments been sent to the TCEQ in Austin? If "YES," please mark this application as "COPY."	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
---	---



**Texas Commission on Environmental Quality  
Form PI-1 General Application for  
Air Preconstruction Permit and Amendments**

<b>XII. COPIES OF THIS APPLICATION</b> <i>(continued)</i>	
C. Is a copy of the Core Data Form, the Form PI-1, and all attachments being sent to the appropriate TCEQ regional office	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
D. Is a copy of the Core Data Form, the Form PI-1, and all attachments being sent to each appropriate local air pollution control program(s)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
List all local air pollution control program(s): City of Dallas	
E. Is a copy of the Core Data Form, Form PI-1, and all attachments (without confidential information) being sent to the EPA Region 6 office in Dallas, Texas? (federal applications only)	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. This facility is located within 100 kilometers of the Rio Grande River and a copy of the application was sent to the International Boundary Water Commission (IBWC):	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. This facility is located within 100 kilometers of a federally-designated Class I area and a copy of the application was sent to the appropriate Federal Land Manager:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>XIII. PROFESSIONAL ENGINEER (P.E.) SEAL</b>	
Is the estimated capital cost of the project greater than \$2 million dollars?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
If "YES," the application must be submitted under the seal of a Texas licensed Professional Engineer (P.E.).	
<b>XIV. DELINQUENT FEES AND PENALTIES</b>	
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol." For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at: <a href="http://www.tceq.state.tx.us/agency/delin/index.html">www.tceq.state.tx.us/agency/delin/index.html</a> .	
<b>XV. SIGNATURE</b>	
The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. I further state that I have read and understand TWC §§ 7.177-7.183, which defines <b>CRIMINAL OFFENSES</b> for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC § 7.187, pertaining to <b>CRIMINAL PENALTIES</b> .	
NAME: David Fuelleman	SIGNATURE:  DATE: 18-Dec-2008
Original Signature Required	



## **GAF ELK MATERIALS CORPORATION**

2600 Singleton Boulevard, Dallas, TX 75212

Tel: 214-637-1060

December 18, 2008

Air Permits Initial Review Team (APIRT)  
Texas Commission on Environmental Quality  
12100 Park 35 Circle, Mail Code 161  
Building C, Third Floor  
Austin, TX 78753

**AIR PERMITS DIVISION**

**DEC 18 2008**

**RECEIVED**

**RE: Permit Amendment Application**  
**Building Materials Corporation of America - Dallas Plant - Dallas County**  
**Permit No. 7711A**  
**TCEQ Account No. DB-0378-S, CN 602717464, RN 100788959**

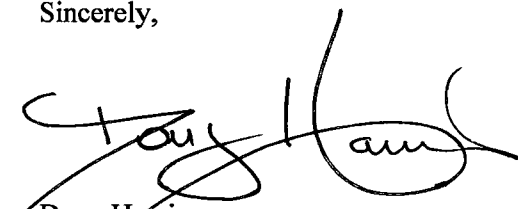
Dear Sir or Madam:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 602717464, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

Please find enclosed a New Source Review (NSR) Permit Amendment Application for the GAF Dallas Plant. This permit amendment application is submitted in accordance with Title 30 of the Texas Administrative Code (30 TAC) Chapter 116 and includes the TCEQ Form PI-1 (General Application for Air Preconstruction Permits and Amendments) and supporting documentation. As demonstrated in the enclosed permit amendment application, the proposed project meets all of the current applicable regulatory requirements. The associated permit amendment fee has been sent under separate cover to the TCEQ Revenue Section. A copy of the check is included in this application for your reference.

If you have any questions regarding this application, please feel free to me at (214) 637-8909 or Ms. Christine Chambers of Trinity Consultants at (972) 661-8100.

Sincerely,



Doug Harris  
Plant Engineer

cc: Mr. Tony Walker, TCEQ Regional Office 4  
Mr. David Miller, City of Dallas, Air Pollution Control Program  
Mr. David Fuelleman, GAF  
Mr. Fred Bright, GAF  
Ms. Christine M. Chambers, Trinity Consultants



## SPECIAL CONDITIONS

Permit Number 7711A

### EMISSION STANDARDS AND FUEL SPECIFICATIONS

1. Total emissions from these sources shall not exceed the values stated on the enclosed table entitled "Emission Sources - Maximum Allowable Emission Rates." The permitted emission limits for all Emission Point Numbers (EPNs) are based on 8,760 annual hours of operation.
2. The fuel for this facility shall be pipeline sweet natural gas as defined in Title 30 Texas Administrative Code Chapter 101 (30 TAC Chapter 101). Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).

### FEDERAL APPLICABILITY

3. The holder of this permit shall comply with all requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated for Asphalt Processing and Asphalt Roofing Manufacture in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Subparts A and UU.

### OPACITY/VISIBLE EMISSION LIMITATIONS

4. Opacity of emissions from the Electrostatic Precipitator (EPN 34), all dust collector stacks, all process heater vents, and building vents shall not exceed 5 percent averaged over a six-minute period as determined by the EPA Test Method (TM) 9 or equivalent. There shall be no discharge into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent except for one consecutive period in any 24-hour period when the transfer lines are being blown for clearing.
5. No visible emissions from this facility operation, road, or travel area shall leave the property. Visible emissions shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined using EPA TM 22 or equivalent.

### OPERATIONAL LIMITATIONS AND WORK PRACTICES

6. The company has represented the following to comply with all TCEQ rules and regulations:
  - A. All filler and backing material shall be received and transferred with no visible emissions leaving the building.

## SPECIAL CONDITIONS

Permit Number 7711A

Page 2

- B. The emissions from blowing stills and in the following Stillyard Storage Tank Nos. T-8, T-9, T-10, T-14, T-15, T-110, and T-120 containing asphalt shall be vented to the thermal oxidizer.
- C. The maximum allowable asphalt throughput rates are 24,886 pounds per hour (lbs/hr) for Line 1, and 41,472 lbs/hr for Line 3.
- D. The maximum allowable production rate for both Lines 1 and 3 is 171 tons per hour (1,498,000 tons per year) of finished shingles.
- 7. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
- 8. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible particulate matter (PM) emissions to maintain compliance with all TCEQ rules and regulations.
- 9. The stack height of the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. The stack height of the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level. (10/09)

## INITIAL DETERMINATION OF COMPLIANCE

- 10. Within 180 days after the initial issuance date of this permit, stack sampling of the Electrostatic Precipitator (EPN 34) and the Boiler/Thermal Oxidizer Vent (EPN 8) for PM, nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) emissions shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Also within 180 days after the initial issuance of this permit, stack sampling of the emissions from Line 1 cooling section (EPN COOL1) and Line 3 cooling section (COOL3) shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Requests for additional time to perform sampling shall be submitted in writing to the TCEQ Regional Office. Additional time to comply with any applicable requirements of 40 CFR Part 60 requires EPA approval. Requests shall be submitted in writing to the TCEQ Austin Compliance Support Division. (10/09)

CONTINUOUS DETERMINATION OF COMPLIANCE

11. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions from EPNs listed in Special Condition No. 4 that exceed the opacity specified in Special Condition No. 4, the holder of this permit shall conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowables specified in the maximum allowable emission rates table. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual or in accordance with applicable EPA Code of Federal Regulations procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling.

SAMPLING REQUIREMENTS

12. Sampling ports and platform(s) shall be installed on the exhaust stack according to the specifications set forth in the TCEQ Sampling Procedures Manual, "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.
13. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their expense.
14. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for initial and/or continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during initial compliance testing, then the production/throughput rates or other parameter may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.
15. A pretest meeting concerning the required sampling and/or monitoring shall be held with personnel from TCEQ before the required tests are performed. Air contaminants to be tested for and test methods to be used shall be confirmed at this pretest meeting.
  - A. During a continuous compliance determination with Special Condition No. 11 stipulations, sampling shall occur within 60 days of the written notification of violation from the TCEQ.
  - B. The TCEQ Regional Office shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice to the TCEQ Regional Office shall include:

## SPECIAL CONDITIONS

Permit Number 7711A

Page 4

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

- C. Air contaminants to be tested for include (but are not limited to) PM, CO, SO<sub>2</sub>, NO<sub>x</sub>, and VOC.
- D. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows: **(10/09)**

One copy to the TCEQ Dallas/Fort Worth Regional Office.

16. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.
17. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division.

## RECORDKEEPING REQUIREMENTS

18. Records shall be kept as specified in General Condition No. 7 and made available upon request to the TCEQ or any air pollution control program having jurisdiction.

Dated October 12, 2009

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

### AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
STILLYARD OPERATION				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
CECO1	T-1 and T-2 Laminating Adhesive Tanks CECO Filter Vent	VOC	0.03	0.17
		PM <sub>10</sub>	0.01	0.02
HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR 5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO <sub>x</sub>	0.10	0.43
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO <sub>x</sub>	3.73	16.34
		SO <sub>2</sub>	0.02	0.09
		PM <sub>10</sub>	0.28	1.23
		CO	3.13	13.71
		VOC	0.21	0.92

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
8	Boiler and Thermal Oxidizer Vent Controlling Tanks T-8, T-9, T-10, T-14, T-15, T-110, T-120, and Blowstills T-13 and T-26	NO <sub>x</sub>	0.72	3.16
		SO <sub>2</sub>	0.73	3.18
		PM <sub>10</sub>	5.00	21.90
		CO	1.26	5.53
		VOC	0.09	0.37

## COMMON TO LINE 1 AND LINE 3

34	Electrostatic Precipitator (for Line 1 and 3) Stack	VOC	5.76	25.23
		PM <sub>10</sub>	3.43	15.02
98	Rail 2 Stack	PM <sub>10</sub>	4.63	4.59
		VOC	0.51	0.51

## LINE NO. 1 OPERATION

1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM <sub>10</sub>	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM <sub>10</sub>	0.03	0.13
1-4	Line 1 (Surfacing Section) Dust Collector Stack No. 1	PM <sub>10</sub>	0.59	2.58
1-5	Line 1 (Surfacing Section) Dust Collector Stack No. 2	PM <sub>10</sub>	0.59	2.58
1-6	Line 1 (Surfacing Section) Dust Collector Stack No. 3	PM <sub>10</sub>	0.59	2.58

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
HTR1	Line 1 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.20	0.86
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
HTR2	Line 1 Thermal Fluid Heater Vent	NO <sub>x</sub>	0.20	0.86
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
COOL1(total 3 stks)	Line No. 1 Cooling Section Exhaust	VOC	1.65	7.23
		PM <sub>10</sub>	4.00	17.52
LINE 3 OPERATION				
25	Sand Application Baghouse Stack	PM <sub>10</sub>	3.86	16.91
26A	Stabilizer Storage Baghouse Stack	PM <sub>10</sub>	0.15	0.70
26B	Stabilizer Storage Baghouse Stack	PM <sub>10</sub>	0.29	1.26
27	Stabilizer Heater Baghouse Stack	PM <sub>10</sub>	0.09	0.40
28	Asphalt Heater Vent	NO <sub>x</sub>	0.59	2.60
		SO <sub>2</sub>	<0.01	0.02
		PM <sub>10</sub>	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
30	Hot Oil Heater Vent (Thermal Fluid Heater)	NO <sub>x</sub>	0.27	1.20
		SO <sub>2</sub>	<0.01	0.01
		PM <sub>10</sub>	0.02	0.10
		CO	0.23	1.00
		VOC	0.01	0.04
FUG1	Plantwide Fugitive Emissions (4)	VOC	0.43	1.88
		PM <sub>10</sub>	0.91	3.97
COOL3 (total 3 stks)	Line 3 Cooling Section (3 Exhaust) Fumes from Asphalt Coater	VOC	2.76	12.09
		PM <sub>10</sub>	6.00	26.30
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.60	2.58
		SO <sub>2</sub>	<0.01	0.02
		PM <sub>10</sub>	0.05	0.20
		CO	0.49	2.16
		VOC	0.03	0.14

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
- (3) NO<sub>x</sub> - total oxides of nitrogen  
 SO<sub>2</sub> - sulfur dioxide  
 PM<sub>10</sub> - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.  
 CO - carbon monoxide  
 VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Fugitive emissions are an estimate only.



EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	<u>Emission Rates *</u>	
			lb/hr	TPY**

\* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year

\*\* Compliance with annual emission limits is based on a rolling 12-month period.

Maximum allowable Asphalt Throughput Rate: Line 1 at 24,886 lbs/hour  
Line 3 at 41,472 lbs/hour

Maximum Allowable Production Rate (Line 1 plus Line 3): 171 tons/hour of finished shingles  
1,498,000 tons/year of finished shingles

Dated January 26, 2009

J. Galvan

Bryan W. Shaw, Ph.D., *Chairman*  
Buddy Garcia, *Commissioner*  
Carlos Rubinstein, *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
*Protecting Texas by Reducing and Preventing Pollution*

August 20, 2010

MR DOUG HARRIS  
ENGINEERING MANAGER  
BUILDING MATERIAL CORPORATION OF AMERICAN  
2006 SINGLETON BLVD  
DALLAS TX 75212-3738

Re: Permit Number: 7711A  
Building Materials Corporation of America  
Asphalt Roofing Production Facility  
Dallas, Dallas County  
Regulated Entity Number: RN100788959  
Customer Reference Number: CN602717464  
Account Number: DB-0378-S

Dear Mr. Hunter:

This letter is your notice that the executive director has issued final approval of the above-referenced application. According to Title 30 Texas Administrative Code § 50.135 (30 TAC § 50.135), the approval became effective on August 20, 2010, the date the executive director signed the permit. Enclosed is a copy of the executive director's response to comments.

You may file a **motion to overturn** with the Office of the Chief Clerk. A motion to overturn is a request for the Commission to review the executive director's decision. Any motion must explain why the Commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the chief clerk in person, or by mail to the chief clerk's address on the attached mailing list. On the same day the motion is transmitted to the chief clerk, please provide copies to the applicant, the executive director's attorney and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the Commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within

Mr. David Hunter  
Page 2  
August 20, 2010

Re: Permit Number 7711A

30 days after the effective date of the approval. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Individual members of the public may seek further information by calling the Texas Commission on Environmental Quality Office of Public Assistance, toll free at 1-800-687-4040.

Sincerely,



LaDonna Castañuela  
Office of the Chief Clerk  
Texas Commission on Environmental Quality

JG/kp

Enclosures

cc: Latha Kambham, Ph.D., Consultant, Trinity Consultants, Dallas  
Ms. Christine M. Otto Chambers, Consultant, Trinity Consultants, Dallas  
Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health  
Services, Dallas  
Air Section Manager, Region 4 - Fort Worth

Project Number: 143272

MAILING LIST FOR PERMIT NUMBER: 7711A  
Dallas County

FOR THE APPLICANT:

Mr. David Fuellerman  
Plant Manager  
Building Materials Corporation of America  
2600 Singleton Boulevard  
Dallas, Texas 75212-3738

PROTESTANTS/INTERESTED PERSONS:

See Attached List

FOR THE EXECUTIVE DIRECTOR:

Ms. Erin Selvera  
Texas Commission on Environmental Quality  
Environmental Law Division, MC-173  
P.O. Box 13087  
Austin, Texas 78711-3087

Mr. Javier Galván, P.E.  
Texas Commission on Environmental Quality  
Office of Permitting and Registration  
Air Permits Division, MC-163  
P.O. Box 13087  
Austin, Texas 78711-3087

FOR OFFICE OF PUBLIC ASSISTANCE:

Ms. Bridget Bohac  
Texas Commission on Environmental Quality  
Office of Public Assistance, MC-108  
P.O. Box 13087  
Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL:

Mr. Blas J. Coy, Jr., Attorney  
Texas Commission on Environmental Quality  
Public Interest Counsel, MC-103  
P.O. Box 13087  
Austin, Texas 78711-3087

FOR THE CHIEF CLERK:

Ms. LaDonna Castañuela  
Texas Commission on Environmental Quality  
Office of Chief Clerk, MC-105  
P.O. Box 13087  
Austin, Texas 78711-3087

DAVID HUNTER  
2006 MCBROOM ST  
DALLAS TX 75212-2450

TCEQ AIR QUALITY PERMIT NUMBER 7711A AUG 12 PM 3:14

APPLICATION BY	§	BEFORE THE	CHIEF CLERKS OFFICE
BUILDING MATERIALS	§		
CORPORATION OF AMERICA	§		
ASPHALT ROOFING PRODUCTION	§	TEXAS COMMISSION ON	
FACILITY	§		
DALLAS, DALLAS COUNTY	§	ENVIRONMENTAL QUALITY	
	§		

### EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from the following persons: David Hunter. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Office of Public Assistance at 1-800-687-4040. General information about the TCEQ can be found at our website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us).

### BACKGROUND

#### Description of Facilities

Building Materials Corporation of America (the Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), §382.0518. Air Quality Permit Number 7711A will authorize the modification of an existing facility that may emit air contaminants.

This permit will authorize the Applicant to modify existing operations to resolve deviations discovered as a result of stack testing. The Applicant will also be consolidating by incorporation, Standard Permit Registration No. 81652 as part of the amendment, and correcting permit representations for existing facilities and for facilities that no longer exist at the plant site. All permit changes will reflect current operating conditions for all permitted facilities at the site. There are no proposed production rate increases for asphalt shingles, physical modifications to existing facilities, or new construction of facilities. Building Materials Corporation of America has requested to increase asphalt throughput rates for Lines 1 and 3. However the increase in asphalt throughput will not result in an increase in the production (output) of asphalt shingles. The facilities are located at 2600 Singleton Blvd., Dallas, Dallas County. Contaminants authorized under this permit include particulate matter, including particulate matter less than 10

microns in diameter and particulate matter less than 2.5 microns in diameter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NO<sub>x</sub>).

### Procedural Background

Before work is begun on the modification of an existing facility that may emit air contaminants, the person planning the modification must obtain a permit amendment from the commission. This permit application is amendment of Air Quality Permit Number 7711A.

The permit application was received on December 19, 2008, and declared administratively complete on January 14, 2009. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI or first public notice) for this permit application was published on February 5, 2009, in English in the *Dallas Observer* and in Spanish in *El Extra*. The Notice of Application and Preliminary Decision (NAPD or second public notice) for this permit application was published on March 11, 2010 in English in the *Dallas Observer*, and in Spanish in *El Extra*. Since this application was administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted in accordance with House Bill 801, 76th Legislature, 1999.

### **COMMENTS AND RESPONSES**

**COMMENT 1:** Commenter believes that air emissions from the plant may be causing, or have already caused, health-related illnesses that may be linked to cancer and other diseases. (David Hunter)

**RESPONSE 1:** Section 382.002 of the TCAA authorizes the commission to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare and physical property including aesthetic enjoyment of air resources by the public and maintenance of adequate visibility. The commission does not regulate on-site worker health, but rather ambient (off-property) air. Criteria pollutants are those pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established. The U.S. EPA, under authority in the Federal Clean Air Act (FCAA), established NAAQS as levels of air quality to protect public health and welfare. The plant will continue to emit PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, CO, and NO<sub>x</sub> as the criteria pollutants. The NAAQS include both primary and secondary standards. The primary standards are those which the Administrator of the EPA determines are necessary, with an adequate margin of safety, to protect the public health, including sensitive members of the population such as children, the elderly, and individuals with existing lung or cardiovascular conditions. Secondary NAAQS standards are those which the Administrator determines are necessary to protect the public welfare and the environment, including animals, crops, vegetation, and buildings, from any known or anticipated adverse effects associated with the presence of an air contaminant in the ambient air. Every permit holder must comply with federal and state standards established for these pollutants to ensure the protectiveness of public health

and welfare. The TCAA requires that the Applicant demonstrate use of best available control technology (BACT) and that the emissions are not detrimental to public health and welfare.

In the review of this application, the proposed emission changes were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emission of PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, CO, and NO<sub>x</sub>. The Applicant will continue to use abatement devices and methods that meet, and in some cases exceed BACT criteria, for asphalt processing and asphalt roofing facilities with consideration given to economic reasonableness and technical practicality. All emissions are vented to an incinerator that will capture and destroy PM/PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and hazardous air pollutants with greater than ninety-five percent efficiency. A review of the RACT/BACT/LAER Clearinghouse (RBLC), a database of nationwide permitted facilities was conducted to determine associated permitted emission limits and methods of abatement for similar sources. The review of the RBLC for asphalt processing and asphalt roofing plants resulted in one plant located in Ohio. The entry for the Ohio plant did show controls for abatement of PM/PM<sub>10</sub>, CO, and VOC. However, the review resulted in no other existing similar stationary source employing abatement devices or methods for control of SO<sub>2</sub>. Evaluation of the permitted limits for CO, VOC, and NO<sub>x</sub> from the Ohio plant indicates the Applicant's proposed limits are lower than those listed in the RBLC for the Ohio plant for these pollutants. Although the Applicant's proposed limit of PM/PM<sub>10</sub> is higher than the limits listed for the Ohio plant, the Applicant's proposed emission reduction plan for PM/PM<sub>10</sub> meets or exceeds BACT of recently reviewed and approved permits for abatement of PM/PM<sub>10</sub> from similar sources of emissions in the same industry type. Therefore, the Applicant's proposed emission limits represent BACT for all pollutants.

When necessary, the Toxicology Division reviews the non-criteria pollutants emitted from the proposed facility, comparing the facility's proposed emissions to Effects Screening Levels (ESLs). ESLs are constituent-specific guideline concentrations used in the Executive Director's effects evaluation of constituent concentrations in air. These guidelines are derived by TCEQ's Toxicology Division and are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetation effects, or materials damage (e.g. corrosion). These health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. ESLs are established considering a generous safety factor to protect not only the general public, but also sensitive members of the general public. In the review of this application, the proposed health effects of asphalt vapors were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emissions of asphalt vapors.



Permit applications for new construction or modifications may be required to include an air quality analysis, which may include air dispersion modeling, to allow the TCEQ staff to evaluate the impact of emissions from the proposed facility upon the health, general welfare, and property of the public and for the Applicant to demonstrate compliance with all air quality rules and regulations and the intent of the TCAA. In this case, refined atmospheric dispersion modeling submitted in support of this application demonstrated that no cumulative concentration of any air contaminant will exceed any NAAQS established for criteria pollutants or any ESLs established for non-criteria pollutants. Appropriate background concentrations for criteria pollutants were retrieved from monitoring stations near the plant site to determine total concentrations for comparison against the NAAQS. Additional Toxicology review of the non-criteria pollutant (asphalt vapors, a class of VOCs) was unnecessary because the total concentration was less than the ESL.

Results of the air dispersion modeling conducted by the applicant indicate the project's modeled maximum ground level concentration ( $GLC_{max}$ ) for 24-hour  $PM_{10}$  is  $68\mu g/m^3$ , which is above the 24-hour  $PM_{10}$  *de minimis* concentration threshold of  $5\mu g/m^3$ . In accordance with TCEQ Air Quality Modeling Guidelines, the next step requires the addition of the appropriate background concentration. In this case,  $56\mu g/m^3$  was added to the modeled concentration, resulting in a  $PM_{10}$   $GLC_{max}$  concentration value of  $124\mu g/m^3$ , which is below the NAAQS protectiveness limit of  $150\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $PM_{10}$  emissions were predicted to be  $18\mu g/m^3$ , which is above the  $PM_{10}$  *de minimis* concentration threshold of  $1\mu g/m^3$ , and thus guidance requires the addition of the appropriate background concentration. In this case, the appropriate background concentration of  $30\mu g/m^3$  was added to the modeled annual  $GLC_{max}$ , resulting in a value of  $48\mu g/m^3$ , which is lower than the NAAQS protectiveness limit of  $50\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 1-hour  $NO_2$  to be  $83\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $10\mu g/m^3$ , and thus guidance requires the addition of the appropriate background concentration. The appropriate background concentration of  $103\mu g/m^3$  was added, resulting in a maximum concentration of  $186\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $188\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $NO_2$  to be  $14\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $1\mu g/m^3$ . The appropriate background concentration of  $30\mu g/m^3$  was added to the modeled value at the  $GLC_{max}$  location, resulting in a maximum concentration of  $44\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $100\mu g/m^3$ .

To address the state property line standard for  $SO_2$ , the modeled 1-hour concentration was used as a surrogate for comparison against the 30-minute standard. Since there is no *de minimis* value, the  $GLC_{max}$  modeled value of  $676\mu g/m^3$  was compared directly against the TCEQ standard of  $1,021\mu g/m^3$  and found to be lower.

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 3-hour  $SO_2$  was found to be  $532\mu g/m^3$  which is above the *de minimis* concentration threshold of  $25\mu g/m^3$ . Therefore, the appropriate background concentration of  $24\mu g/m^3$  was added, resulting in a maximum concentration of  $556\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $1,300\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 24-hour  $SO_2$  to be  $329\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $5\mu g/m^3$ . Therefore, the appropriate background concentration of  $13\mu g/m^3$  was added to the modeled value at the  $GLC_{max}$  location, resulting in a maximum concentration of  $342\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $365\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $SO_2$  to be  $39\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $1\mu g/m^3$ . Therefore, the appropriate background concentration of  $3\mu g/m^3$  was added to the modeled value at the  $GLC_{max}$  location, resulting in a maximum concentration of  $42\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $80\mu g/m^3$ .

Asphalt vapors from the facilities and operating procedure were evaluated on a short-term and a long-term basis for comparison to the ESL. On a 1-hour basis, the modeled value at the  $GLC_{max}$  location was found to be  $336\mu g/m^3$ . This value is below the TCEQ Toxicology Division's ESL of  $350\mu g/m^3$  required for protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility. On an annual basis, the modeled value at the  $GLC_{max}$  location was found to be  $25\mu g/m^3$ . This value is also below the TCEQ Toxicology Section's ESL of  $35\mu g/m^3$  required for protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility.

All other contaminants were evaluated to be below the respective *de minimis* levels corresponding to the contaminant and the time averaging period required by the NAAQS to determine protectiveness.

In addition to meeting the above federal and state standards and guidelines, applicants must comply with 30 TAC § 101.4, which prohibits nuisance conditions. Specifically, that rule states that "no person shall discharge from any source" air contaminants which are or may "tend to be injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facilities at the plant are operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free

Environmental Complaints Hotline at 1-888-777-3186. If the plant is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. The TCEQ has procedures in place for accepting environmental complaints from the general public but now has a new tool for bringing potential environmental problems to light. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law and the information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us) (under Publications, search for document no. 278).

#### CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director  
Environmental Law Division



---

Erin Selvera, Staff Attorney  
Environmental Law Division  
State Bar Number 24043385  
PO Box 13087, MC 173  
Austin, Texas 78711-3087  
(512) 239-6033

REPRESENTING THE  
EXECUTIVE DIRECTOR OF THE  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

David Hunter  
2006 McBroom Street  
Dallas, TX 75212

H OPA  
FEB 13 2009  
BY BP

2/11/2009  
9 PM

NSR  
66703

TO: Texas Commission On Environmental Quality  
Office Of The Chief Clerk MC-105  
P.O. Box 13087  
Austin, TX 78711-3087

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2009 FEB 13 AM 10:19  
CHIEF CLERKS OFFICE

Re: Build Materials Corporation Of America  
Air Quality Permit Number #7711A

I am requesting a contested hearing. The air emission contamination may be causing health or have caused health illnesses that may be link to cancer or other uncuriable disease. My property is less then a mile from this facility where I have stayed and continue to live if possible.

Sincerely  
David Hunter  
2006 McBroom Street  
Dallas, TX 75212

P.S.

Could you please mail a copy of your summary to me also at the following address below.

David Hunter #07085052  
Dallas County Jail / North 6 E-5 Tank  
P.O. Box 660334  
Dallas, Texas 75266-0334

**From:** "Rod Johnson" <RJohnson@brownmccarroll.com>  
**To:** <JGalvan@tceq.state.tx.us>  
**CC:** <dharris@gaf.com>, <FBright@gaf.com>, <CChambers@trinityconsultants.com>...  
**Date:** 8/20/2010 10:49 AM  
**Subject:** Re: Update for GAF - Permit No. 7711A

Thanks! If there are any questions you or Mike can't answer off the top of your heads, or you need to locate a document, please let us know and we will assist.

I will touch base with Stephanie in a little bit. GAF really appreciates this last minute push and your help.

Thanks again.  
Rod

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-----Original Message-----

**From:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**To:** Johnson, Rod <RJohnson@brownmccarroll.com>  
**Cc:** Chambers, Christine <CChambers@trinityconsultants.com>  
**Cc:** Kambham, Latha <LKambham@trinityconsultants.com>

**Sent:** 8/20/2010 10:38:47 AM  
**Subject:** Update for GAF - Permit No. 7711A

Rod,

I just got the re-typed final package back from our document processors, and I just handed-over the final package, with all corrections, comments, changes incorporated, to the section manager. Theoretically there should be no more changes, and it should make its way over to the division director some time shortly. M. Gould informed me this morning that the director had no objections to what you all had represented as supporting arguments/evidence for the HAPs issue; therefore, it should be signed today. I will check the status periodically, but I imagine that you could also call the section manager to ensure that the final package travels to the director's desk today to be signed, i.e. if more changes or questions are to be made, that we (the team leader and I) can address them appropriately and quickly. To my knowledge, no further comments exist, from either the section manager or the division director. Thanks.

Javier

**Javier Galvan - Update for GAF - Permit No. 7711A**

---

**From:** Javier Galvan  
**To:** Johnson, Rod  
**Date:** 8/20/2010 10:38 AM  
**Subject:** Update for GAF - Permit No. 7711A  
**CC:** Chambers, Christine; Kambham, Latha

---

Rod,

I just got the re-typed final package back from our document processors, and I just handed-over the final package, with all corrections, comments, changes incorporated, to the section manager. Theoretically there should be no more changes, and it should make its way over to the division director some time shortly. M. Gould informed me this morning that the director had no objections to what you all had represented as supporting arguments/evidence for the HAPs issue; therefore, it should be signed today. I will check the status periodically, but I imagine that you could also call the section manager to ensure that the final package travels to the director's desk today to be signed, i.e. if more changes or questions are to be made, that we (the team leader and I) can address them appropriately and quickly. To my knowledge, no further comments exist, from either the section manager or the division director. Thanks.

Javier

**Javier Galvan - GAF (BMCA) Acceptance of draft permit GAF - Permit No. 7711A**

---

**From:** "Rod Johnson" <RJohnson@brownmccarroll.com>  
**To:** <jGalvan@tceq.state.tx.us>  
**Date:** 8/19/2010 4:21 PM  
**Subject:** GAF (BMCA) Acceptance of draft permit GAF - Permit No. 7711A  
**CC:** "Bright, Fred" <FBright@gaf.com>, "Chambers, Christine" <CChambers@trinityconsultants.com>, "Harris, Doug" <dharris@gaf.com>, "Kambham, Latha" <LKambham@trinityconsultants.com>, <mgould@tceq.state.tx.us>, <showell@tceq.state.tx.us>  
**Attachments:** 0812-2009 Email\_HAP Emissions\_1.pdf; CND - Building Materials Corporation of America (7711A) (amend)\_1.doc; HAP Emissions Summary (081109)\_1.pdf; 0812-2009 Email\_HAP Emissions\_1.pdf; CND - Building Materials Corporation of America (7711A) (amend)\_1.doc; HAP Emissions Summary (081109)\_1.pdf

---

Dear Mr. Galvan,

In order to expedite and finalize the issuance of the amendment to Permit No. 7711A, BMCA / GAF accepts the revised draft sent earlier today.

We understand APD has a question as to the source of the HAP emissions projections. As provided to TCEQ previously (see Attached), the calculations were based on (1) proposed through put rates in the amended permit and (2) data collected by EPA in preparation to establish MACT and Area Source standards under Part 63. The GAF plant is an area source and subject to 40 CFR Part 63, Subpart AAAAAAA. Under Subpart "7A", testing for HAPs will be required and submitted to TCEQ.

As to increases in HAP emissions associated with proposed throughput changes, there is no change in annual throughput, only short term throughput to correct an error in the permit. Therefore the annual limit does not change.

This permit amendment is part of an Agreed Order requirement for which BMCA has had to ask for multiple extensions. On behalf of BMCA, I respectfully request that the final permit be issued no later than Friday, August 20, 2010.

We are available to speak with you and TCEQ management tomorrow morning to iron out any last issues. If you have any questions, please do not hesitate to contact any one of us copied on this email.

Thank you for your prompt assistance.

Best Regards,

Rod

**BROWN** : Attorneys  
**MCCARROLL** : at Law

**Rod Johnson**

Partner

Brown McCarroll, L.L.P.

111 Congress Avenue, Suite 1400, Austin, TX 78701  
office: 512-479-11125 | mobile: 512-636-6601 | fax: 512-479-1101  
[www.brownmccarroll.com](http://www.brownmccarroll.com) | [rjohnson@brownmccarroll.com](mailto:rjohnson@brownmccarroll.com) | [bio](#)

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Christine Chambers/Trinity Consultants 08/12/2009 09:38 AM

To: "Javier Galvan" <JGalvan@tceq.state.tx.us>

cc: "Doug Harris" <dharris@gaf.com>, Latha Kambham/Trinity Consultants@TCI\_Dallas

Project: GAF Materials Corporation 084401.0087 / 084401.0088

Subject: Building Materials - NSR No. 7711A: Follow-Up Items

---

Javier,

Per our July 17, 2009 call related to the GAF Materials Draft NSR Permit No. 7711A (see attached), please find below the last follow-up items. If you would like to discuss these further, please let us know.

Thank you,  
Christine

**NESHAP LLLLL Determination: GAF Dallas Plant is not a major source of HAPs**

Please find attached site-wide HAP emissions calculations for the GAF Dallas Plant demonstrating the site is a minor source of HAPs. Emission from Natural Gas Combustion are calculated based on potential annual natural gas usage and emission factors obtained from AP-42 Section 1.4. Natural Gas Combustion. Emissions from all other asphalt related operations are calculated based on the potential annual asphalt throughput rates and emission factors obtained from the Asphalt Roofing Manufacturer's Association (ARMA) and EPA stack sampling program for MACT Standards (summary of sampling results). Since these emission factors are not published, and we can not confirm their absolute accuracy, GAF believes they are significantly accurate to demonstrate the site is a minor source for HAP and GAF therefore submits these values solely for that purpose and to demonstrate the site's emission limitations are not subject to Sec. 112 MACT requirements.

**Special Condition 7.B. Proposed Special Condition wording based on outlet concentration .**

The control efficiency of the thermal oxidizer is not used as the basis for the proposed emission rates and as such, GAF is requesting that the wording for Special Condition 7.B. track the language of TCEQ's 30 TAC Chapter 115.122 requirements by using an outlet concentration. *"The thermal oxidizer shall be operated and maintained to achieve a minimum VOC control efficiency of at least 90% or to a VOC concentration of no more than 20 parts per million by volume (ppmv) (on a dry basis corrected to 3.0% oxygen)."*

- **Current Draft Special Condition Verbiage:**

7.B. The emissions from Stillyard Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120 containing asphalt, from Blowing Stills T-13 and T-26, from truck and railcar loading and unloading operations, and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer. The thermal oxidizer shall be operated and maintained to achieve a minimum VOC control efficiency of 98 percent. (8/09)

- **Proposed Draft Special Condition Verbiage:**

7.B. The emissions from Stillyard Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120 containing asphalt, from Blowing Stills T-13 and T-26, from truck and railcar loading and unloading operations, and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer. The thermal oxidizer shall be operated and maintained to achieve a VOC concentration of no more than 20 parts

per million by volume (ppmv) (on a dry basis corrected to 3.0% oxygen)." (8/09)



CND - Building Materials Corporation of America (7711A) (amend).doc HAP Emissions Summary (081109).pdf

\*\*\*\*\*

Christine M. Otto Chambers  
Managing Consultant  
Trinity Consultants  
(972) 661-8100 Phone  
(972) 385-9203 Fax  
cchambers@trinityconsultants.com

\*\*\*\*\*

## SPECIAL CONDITIONS

Permit Number 7711A

### EMISSION STANDARDS AND FUEL SPECIFICATIONS

1. Total emissions from these sources shall not exceed the values stated on the enclosed table entitled "Emission Sources - Maximum Allowable Emission Rates." The permitted emission limits for all emission point numbers (EPNs), with the exception of the Standby Boiler (EPN BLR 5), are based on 8,760 annual hours of operation. The permitted emission limits for EPN BLR 5 are based on 480 annual hours of operation. (8/09)
2. Fuel for the facilities shall be pipeline sweet natural gas as defined in Title 30 Texas Administrative Code Chapter 101 (30 TAC Chapter 101). Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).
3. The holder of this permit shall comply with all requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources (NSPS), promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR 60), for Asphalt Processing and Asphalt Roofing Manufacture in Subpart UU, for Small Industrial-Commercial-Institutional Steam Generating Units in Subpart Dc, and with the General Provisions set forth in Subpart A. (8/09)

### OPACITY/VISIBLE EMISSION LIMITATIONS

4. Opacity of emissions from the coalescing filter mist systems (EPN CFL/34), the electrostatic precipitator (EPN CFL/34) when used as a back-up control device for the filter mist systems, all dust collector stacks, all process heater vents, and building vents shall not exceed 5 percent averaged over a six-minute period as determined by EPA Test Method (TM) 9 or equivalent. (8/09)
5. Opacity of emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed zero percent averaged over a six-minute period as determined by EPA TM 9 or equivalent, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of emissions from any blowing still shall not exceed zero percent averaged over a six-minute period as determined by EPA TM 9 or equivalent. Opacity of emissions from any storage silo and mineral handling facility shall not exceed one percent averaged over a six-minute period as determined by EPA TM 9 or equivalent. (8/09)
6. No visible emissions from this asphalt processing and asphalt roofing manufacturing operation, road, or travel area shall leave the property. Visible emissions

## **SPECIAL CONDITIONS**

Permit Number 7711A

Page Number 2

shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined using EPA TM 22 or equivalent. **(8/09)**

## **OPERATIONAL LIMITATIONS AND WORK PRACTICES**

7. The company has represented the following to comply with all TCEQ rules and regulations:
  - A. All filler and backing material shall be received and transferred with no visible emissions from these materials leaving the building. **(8/09)**
  - B. The emissions from Stillyard Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120 containing asphalt, from Blowing Stills T-13 and T-26, from truck and railcar loading and unloading operations, and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer. The thermal oxidizer shall be operated and maintained to achieve a minimum VOC control efficiency of 98 percent. **(8/09)**
  - C. The maximum allowable asphalt throughput rates are 32,063 pounds per hour (lbs/hr) for Line 1 and 53,438 lbs/hr for Line 3. **(8/09)**
  - D. The maximum allowable production rate for both Line 1 and Line 3 is 171 tons per hour and 1,498,000 tons per year of finished shingles. **(8/09)**
8. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
9. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible particulate matter (PM) emissions to maintain compliance with all TCEQ rules and regulations.
10. There shall be no changes in representations unless the permit is altered or amended. **(8/09)**

## **INITIAL DETERMINATION OF COMPLIANCE**

11. Within 180 days after the issuance date of this permit, stack sampling of the Electrostatic Precipitator (EPN 34) and the Boiler/Thermal Oxidizer Vent (EPN 8) for PM, nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) emissions shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Also within 180 days after the issuance of this permit, stack sampling

## SPECIAL CONDITIONS

Permit Number 7711A

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of the emissions from Line 1 cooling section (EPN COOL1) and Line 3 cooling section (COOL3) shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with any applicable requirements of 40 CFR Part 60 requires EPA approval, and requests shall be submitted to the TCEQ Austin Compliance Support Division.

### CONTINUOUS DETERMINATION OF COMPLIANCE

12. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions that exceed the opacity limits specified in Special Condition Nos. 4 and 5, the holder of this permit shall conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowables specified in the maximum allowable emission rates table. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual or in accordance with applicable EPA Code of Federal Regulations procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. (8/09)

Possible additional testing for the thermal oxidizer

### SAMPLING REQUIREMENTS

13. Sampling ports and platform(s) shall be installed on the exhaust stack according to the specifications set forth in the TCEQ Sampling Procedures Manual, "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.
14. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their expense.
15. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for initial and/or continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during initial compliance testing, then the production/throughput rates or other parameter may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.

SPECIAL CONDITIONS

Permit Number 7711A

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16. A pretest meeting concerning the required sampling and/or monitoring shall be held with personnel from TCEQ before the required tests are performed. Air contaminants to be tested for and test methods to be used shall be confirmed at this pretest meeting.

A. During a continuous compliance determination with Special Condition No. 11 stipulations, sampling shall occur within 60 days of the written notification of violation from the TCEQ.

B. The TCEQ Regional Office shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice to the TCEQ Regional Office shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

C. Air contaminants to be tested for include (but are not limited to) PM, CO, SO<sub>2</sub>, NO<sub>x</sub>, and VOC.

D. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Dallas/Fort Worth Regional Office;  
One copy to the TCEQ Austin Compliance Support Division.

17. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.

18. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division.

SPECIAL CONDITIONS

Permit Number 7711A

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RECORDKEEPING REQUIREMENTS

19. In addition to the recordkeeping requirements specified in General Condition No. 7 and 40 CFR 60, Subparts A, Dc, and UU, the following records shall be kept and maintained on-site for a rolling twenty-four month period: **(8/09)**
  - A. Records for exempted process vents; and
  - B. Records of repairs and maintenance of all pollution abatement equipment.

## **Javier Galvan - draft permit GAF - Permit No. 7711A**

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**From:** Javier Galvan  
**To:** Kambham, Latha  
**Date:** 8/19/2010 1:19 PM  
**Subject:** draft permit GAF - Permit No. 7711A  
**CC:** Johnson, Rod  
**Attachments:** CND - rewrite\_143272.doc; MRT - rewrite\_143272.doc

---

Latha,

see attached.



**Javier Galvan - Re: Fwd: BMCA air permit**

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**From:** Mike Gould  
**To:** Selvera, Erin  
**Date:** 8/17/2010 5:16 PM  
**Subject:** Re: Fwd: BMCA air permit  
**CC:** Galvan, Javier

---

Yes, we have posted the project on the ED's agenda and it will be ready for issuance this week.

>>> Erin Selvera 8/17/2010 5:13 PM >>>

Received the email below from BMC's counsel. Please double check this and let me know. (I assume it is based on Mike's phone call today.)

>>> "Rod Johnson" <RJohnson@brownmccarroll.com> 8/17/2010 4:49 PM >>>

Hi Erin,

I just wanted to check to make sure this item is on the ED's agenda so it can be signed this week. Can you let me know? Thx  
Rod

CONFIDENTIALITY NOTICE: This communication is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient of this information, you are notified that any use, dissemination, distribution, or copying of the communication is strictly prohibited.

## Mike Gould - Fwd: BMCA air permit

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**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 8/17/2010 5:14 PM  
**Subject:** Fwd: BMCA air permit  
**CC:** Gould, Mike

---

Received the email below from BMC's counsel. Please double check this and let me know. (I assume it is based on Mike's phone call today.)

>>> "Rod Johnson" <RJohnson@brownmccarroll.com> 8/17/2010 4:49 PM >>>

Hi Erin,

I just wanted to check to make sure this item is on the ED's agenda so it can be signed this week. Can you let me know? Thx

Rod

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**Javier Galvan - BMC**

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 8/16/2010 1:51 PM  
**Subject:** BMC  
**CC:** Gould, Mike  
**Attachments:** Order Remanding case to ED for uncontested processing.pdf

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Javier,  
We had the preliminary hearing for BMC this morning. No protestants appeared so the case was remanded to the ED as uncontested. Attached is the judge's order. Please forward the package up the chain for Steve's signature. Let me know if you need anything.  
Thanks,  
Erin

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
Phone 512-239-6033  
Fax 512-239-0606

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 Please consider the environment before printing this e-mail

**SOAH DOCKET NO. 582-10-5031  
DOCKET NO. 2010-0896-AIR**

<b>APPLICATION OF BUILDING</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>MATERIALS CORPORATION OF</b>	<b>§</b>	
<b>AMERICA ASPHALT ROOFING</b>	<b>§</b>	<b>OF</b>
<b>PRODUCTION FACILITY,</b>	<b>§</b>	
<b>DALLAS COUNTY</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**ORDER NO. 1**

On August 16, 2010, the Administrative Law Judge (ALJ) convened a preliminary hearing in Austin, Texas regarding the above-referenced application. The Applicant, Building Materials Corporation of America, and the Executive Director (ED) were present at the preliminary hearing. No other persons were present. The ED offered the following exhibits into evidence:

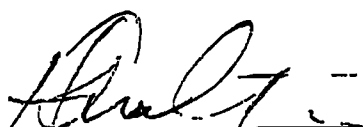
Exhibit A:	Notice of Hearing
Exhibit B:	July 28, 2010 letter, including Affidavit of Publication of Notice of Hearing
Exhibit C:	ED's Response to Comments

There were no objections to admission of these three exhibits and the ALJ admitted them into evidence. Based on these exhibits, the ALJ concluded that notice was sufficient.

Since no persons were present seeking to be named as a protesting party, the ED moved that the ALJ remand this application to the ED to be processed as an uncontested matter. The ALJ agrees with the ED's motion.

Therefore, it is **ORDERED** that this matter is **REMANDED** to the ED for further processing and this case is **DISMISSED** from the docket of the State Office of Administrative Hearings.

Issued: August 16, 2010

  
\_\_\_\_\_  
**KERRIE JO QUALTROUGH**  
**ADMINISTRATIVE LAW JUDGE**  
**STATE OFFICE OF ADMINISTRATIVE HEARINGS**

**STATE OFFICE OF ADMINISTRATIVE HEARINGS**

**AUSTIN OFFICE**  
300 West 15th Street Suite 502  
Austin, Texas 78701  
Phone: (512) 475-4993  
Fax: (512) 475-4994

**SERVICE LIST**

**AGENCY:** Environmental Quality, Texas Commission on (TCEQ)  
**STYLE/CASE:** BUILDING MATERIALS CORP OF AMERICA  
**SOAH DOCKET NUMBER:** 582-10-5031  
**REFERRING AGENCY CASE:** 2010-0896-AIR

**STATE OFFICE OF ADMINISTRATIVE  
HEARINGS**

**ADMINISTRATIVE LAW JUDGE**  
**ALJ KERRIE QUALTROUGH**

**REPRESENTATIVE / ADDRESS****PARTIES**

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rjohnson@mailbmc.com

BUILDING MATERIALS CORPORATION OF AMERICA

---

cc: Docket Clerk, State Office of Administrative Hearings

**STATE OFFICE OF ADMINISTRATIVE HEARINGS****AUSTIN OFFICE****300 West 15th Street Suite 502****Austin, Texas 78701****Phone: (512) 475-4993****Fax: (512) 475-4994****DATE:****08/16/2010****NUMBER OF PAGES INCLUDING THIS COVER SHEET:****4****REGARDING:****ORDER NO. 1****DOCKET NUMBER:****582-10-5031****JUDGE KERRIE QUALTROUGH****FAX TO:****FAX TO:****ROD JOHNSON (BROWN MCCARROLL L.L.P.)****(512) 479-1101****DANNY G WORRELL****(512) 479-1101****BLAS J. COY, JR. (TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY)****(512) 239-6377****ERIN SELVERA (TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY)****(512) 239-0606****TCEQ Docket Clerk, Fax Number 512/239-3311****NOTE: IF ALL PAGES ARE NOT RECEIVED, PLEASE CONTACT LISA MARTINEZ(Ima) (512) 475-4993**

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TCEQ AIR QUALITY PERMIT NUMBER 7711A 2010 AUG 12 PM 3:14

APPLICATION BY  
BUILDING MATERIALS  
CORPORATION OF AMERICA  
ASPHALT ROOFING PRODUCTION  
FACILITY  
DALLAS, DALLAS COUNTY

§  
§  
§  
§  
§  
§

BEFORE THE CHIEF CLERKS OFFICE  
  
TEXAS COMMISSION ON  
  
ENVIRONMENTAL QUALITY

### EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from the following persons: David Hunter. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Office of Public Assistance at 1-800-687-4040. General information about the TCEQ can be found at our website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us).

### BACKGROUND

#### Description of Facilities

Building Materials Corporation of America (the Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), §382.0518. Air Quality Permit Number 7711A will authorize the modification of an existing facility that may emit air contaminants.

This permit will authorize the Applicant to modify existing operations to resolve deviations discovered as a result of stack testing. The Applicant will also be consolidating by incorporation, Standard Permit Registration No. 81652 as part of the amendment, and correcting permit representations for existing facilities and for facilities that no longer exist at the plant site. All permit changes will reflect current operating conditions for all permitted facilities at the site. There are no proposed production rate increases for asphalt shingles, physical modifications to existing facilities, or new construction of facilities. Building Materials Corporation of America has requested to increase asphalt throughput rates for Lines 1 and 3. However the increase in asphalt throughput will not result in an increase in the production (output) of asphalt shingles. The facilities are located at 2600 Singleton Blvd., Dallas, Dallas County. Contaminants authorized under this permit include particulate matter, including particulate matter less than 10



microns in diameter and particulate matter less than 2.5 microns in diameter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NO<sub>x</sub>).

### Procedural Background

Before work is begun on the modification of an existing facility that may emit air contaminants, the person planning the modification must obtain a permit amendment from the commission. This permit application is amendment of Air Quality Permit Number 7711A.

The permit application was received on December 19, 2008, and declared administratively complete on January 14, 2009. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI or first public notice) for this permit application was published on February 5, 2009, in English in the *Dallas Observer* and in Spanish in *El Extra*. The Notice of Application and Preliminary Decision (NAPD or second public notice) for this permit application was published on March 11, 2010 in English in the *Dallas Observer*, and in Spanish in *El Extra*. Since this application was administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted in accordance with House Bill 801, 76th Legislature, 1999.

### **COMMENTS AND RESPONSES**

**COMMENT 1:** Commenter believes that air emissions from the plant may be causing, or have already caused, health-related illnesses that may be linked to cancer and other diseases. (David Hunter)

**RESPONSE 1:** Section 382.002 of the TCAA authorizes the commission to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare and physical property including aesthetic enjoyment of air resources by the public and maintenance of adequate visibility. The commission does not regulate on-site worker health, but rather ambient (off-property) air. Criteria pollutants are those pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established. The U.S. EPA, under authority in the Federal Clean Air Act (FCAA), established NAAQS as levels of air quality to protect public health and welfare. The plant will continue to emit PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, CO, and NO<sub>x</sub> as the criteria pollutants. The NAAQS include both primary and secondary standards. The primary standards are those which the Administrator of the EPA determines are necessary, with an adequate margin of safety, to protect the public health, including sensitive members of the population such as children, the elderly, and individuals with existing lung or cardiovascular conditions. Secondary NAAQS standards are those which the Administrator determines are necessary to protect the public welfare and the environment, including animals, crops, vegetation, and buildings, from any known or anticipated adverse effects associated with the presence of an air contaminant in the ambient air. Every permit holder must comply with federal and state standards established for these pollutants to ensure the protectiveness of public health

and welfare. The TCAA requires that the Applicant demonstrate use of best available control technology (BACT) and that the emissions are not detrimental to public health and welfare.

In the review of this application, the proposed emission changes were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emission of PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, CO, and NO<sub>x</sub>. The Applicant will continue to use abatement devices and methods that meet, and in some cases exceed BACT criteria, for asphalt processing and asphalt roofing facilities with consideration given to economic reasonableness and technical practicality. All emissions are vented to an incinerator that will capture and destroy PM/PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and hazardous air pollutants with greater than ninety-five percent efficiency. A review of the RACT/BACT/LAER Clearinghouse (RBLC), a database of nationwide permitted facilities was conducted to determine associated permitted emission limits and methods of abatement for similar sources. The review of the RBLC for asphalt processing and asphalt roofing plants resulted in one plant located in Ohio. The entry for the Ohio plant did show controls for abatement of PM/PM<sub>10</sub>, CO, and VOC. However, the review resulted in no other existing similar stationary source employing abatement devices or methods for control of SO<sub>2</sub>. Evaluation of the permitted limits for CO, VOC, and NO<sub>x</sub> from the Ohio plant indicates the Applicant's proposed limits are lower than those listed in the RBLC for the Ohio plant for these pollutants. Although the Applicant's proposed limit of PM/PM<sub>10</sub> is higher than the limits listed for the Ohio plant, the Applicant's proposed emission reduction plan for PM/PM<sub>10</sub> meets or exceeds BACT of recently reviewed and approved permits for abatement of PM/PM<sub>10</sub> from similar sources of emissions in the same industry type. Therefore, the Applicant's proposed emission limits represent BACT for all pollutants.

When necessary, the Toxicology Division reviews the non-criteria pollutants emitted from the proposed facility, comparing the facility's proposed emissions to Effects Screening Levels (ESLs). ESLs are constituent-specific guideline concentrations used in the Executive Director's effects evaluation of constituent concentrations in air. These guidelines are derived by TCEQ's Toxicology Division and are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetation effects, or materials damage (e.g. corrosion). These health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. ESLs are established considering a generous safety factor to protect not only the general public, but also sensitive members of the general public. In the review of this application, the proposed health effects of asphalt vapors were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emissions of asphalt vapors.

Permit applications for new construction or modifications may be required to include an air quality analysis, which may include air dispersion modeling, to allow the TCEQ staff to evaluate the impact of emissions from the proposed facility upon the health, general welfare, and property of the public and for the Applicant to demonstrate compliance with all air quality rules and regulations and the intent of the TCAA. In this case, refined atmospheric dispersion modeling submitted in support of this application demonstrated that no cumulative concentration of any air contaminant will exceed any NAAQS established for criteria pollutants or any ESLs established for non-criteria pollutants. Appropriate background concentrations for criteria pollutants were retrieved from monitoring stations near the plant site to determine total concentrations for comparison against the NAAQS. Additional Toxicology review of the non-criteria pollutant (asphalt vapors, a class of VOCs) was unnecessary because the total concentration was less than the ESL.

Results of the air dispersion modeling conducted by the applicant indicate the project's modeled maximum ground level concentration ( $GLC_{max}$ ) for 24-hour  $PM_{10}$  is  $68\mu g/m^3$ , which is above the 24-hour  $PM_{10}$  *de minimis* concentration threshold of  $5\mu g/m^3$ . In accordance with TCEQ Air Quality Modeling Guidelines, the next step requires the addition of the appropriate background concentration. In this case,  $56\mu g/m^3$  was added to the modeled concentration, resulting in a  $PM_{10}$   $GLC_{max}$  concentration value of  $124\mu g/m^3$ , which is below the NAAQS protectiveness limit of  $150\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $PM_{10}$  emissions were predicted to be  $18\mu g/m^3$ , which is above the  $PM_{10}$  *de minimis* concentration threshold of  $1\mu g/m^3$ , and thus guidance requires the addition of the appropriate background concentration. In this case, the appropriate background concentration of  $30\mu g/m^3$  was added to the modeled annual  $GLC_{max}$ , resulting in a value of  $48\mu g/m^3$ , which is lower than the NAAQS protectiveness limit of  $50\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 1-hour  $NO_2$  to be  $83\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $10\mu g/m^3$ , and thus guidance requires the addition of the appropriate background concentration. The appropriate background concentration of  $103\mu g/m^3$  was added, resulting in a maximum concentration of  $186\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $188\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $NO_2$  to be  $14\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $1\mu g/m^3$ . The appropriate background concentration of  $30\mu g/m^3$  was added to the modeled value at the  $GLC_{max}$  location, resulting in a maximum concentration of  $44\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $100\mu g/m^3$ .

To address the state property line standard for  $SO_2$ , the modeled 1-hour concentration was used as a surrogate for comparison against the 30-minute standard. Since there is no *de minimis* value, the  $GLC_{max}$  modeled value of  $676\mu g/m^3$  was compared directly against the TCEQ standard of  $1,021\mu g/m^3$  and found to be lower.

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 3-hour  $SO_2$  was found to be  $532\mu g/m^3$  which is above the *de minimis* concentration threshold of  $25\mu g/m^3$ . Therefore, the appropriate background concentration of  $24\mu g/m^3$  was added, resulting in a maximum concentration of  $556\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $1,300\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 24-hour  $SO_2$  to be  $329\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $5\mu g/m^3$ . Therefore, the appropriate background concentration of  $13\mu g/m^3$  was added to the modeled value at the  $GLC_{max}$  location, resulting in a maximum concentration of  $342\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $365\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $SO_2$  to be  $39\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $1\mu g/m^3$ . Therefore, the appropriate background concentration of  $3\mu g/m^3$  was added to the modeled value at the  $GLC_{max}$  location, resulting in a maximum concentration of  $42\mu g/m^3$ . This value is below the NAAQS protectiveness limit of  $80\mu g/m^3$ .

Asphalt vapors from the facilities and operating procedure were evaluated on a short-term and a long-term basis for comparison to the ESL. On a 1-hour basis, the modeled value at the  $GLC_{max}$  location was found to be  $336\mu g/m^3$ . This value is below the TCEQ Toxicology Division's ESL of  $350\mu g/m^3$  required for protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility. On an annual basis, the modeled value at the  $GLC_{max}$  location was found to be  $25\mu g/m^3$ . This value is also below the TCEQ Toxicology Section's ESL of  $35\mu g/m^3$  required for protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility.

All other contaminants were evaluated to be below the respective *de minimis* levels corresponding to the contaminant and the time averaging period required by the NAAQS to determine protectiveness.

In addition to meeting the above federal and state standards and guidelines, applicants must comply with 30 TAC § 101.4, which prohibits nuisance conditions. Specifically, that rule states that "no person shall discharge from any source" air contaminants which are or may "tend to be injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facilities at the plant are operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free

Environmental Complaints Hotline at 1-888-777-3186. If the plant is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. The TCEQ has procedures in place for accepting environmental complaints from the general public but now has a new tool for bringing potential environmental problems to light. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law and the information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us) (under Publications, search for document no. 278).

#### CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director  
Environmental Law Division



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Erin Selvera, Staff Attorney  
Environmental Law Division  
State Bar Number 24043385  
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(512) 239-6033

REPRESENTING THE  
EXECUTIVE DIRECTOR OF THE  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 8/10/2010 3:17 PM  
**Subject:** Take a look  
**Attachments:** RTC\_143272 8-4-2010.doc

Let me know if you are ok with the paragraph with my edits. Feel free to tweak it if necessary.

## **TCEQ AIR QUALITY PERMIT NUMBER 7711A**

<b>APPLICATION BY</b>	<b>§</b>	<b>BEFORE THE</b>
<b>BUILDING MATERIALS</b>	<b>§</b>	
<b>CORPORATION OF AMERICA</b>	<b>§</b>	
<b>ASPHALT ROOFING PRODUCTION</b>	<b>§</b>	<b>TEXAS COMMISSION ON</b>
<b>FACILITY</b>	<b>§</b>	
<b>DALLAS, DALLAS COUNTY</b>	<b>§</b>	
	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>

### **EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT**

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from the following persons: David Hunter. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Office of Public Assistance at 1-800-687-4040. General information about the TCEQ can be found at our website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us).

### **BACKGROUND**

#### Description of Facilities

Building Materials Corporation of America (the Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), §382.0518. Air Quality Permit Number 7711A will authorize the modification of an existing facility that may emit air contaminants.

This permit will authorize the Applicant to modify existing operations to resolve deviations that resulted from stack testing. The Applicant will also be consolidating by incorporation, Standard Permit Registration No. 81652 as part of the amendment, and correcting permit representations for existing facilities and for facilities that no longer exist at the plant site. All permit changes will reflect current operating conditions for all permitted facilities at the site. There are no proposed production rate increases for asphalt shingles, physical modifications to existing facilities, or new construction of facilities. Building Materials Corporation of America has requested to increase asphalt throughput rates for Lines 1 and 3. However the increase in asphalt throughput will not result in an increase in the production (output) of asphalt shingles. The facilities are located at 2600 Singleton Blvd Dallas, Dallas County. Contaminants authorized under this permit include particulate matter, including particulate matter less than 10 microns in

diameter and particulate matter less than 2.5 microns in diameter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NO<sub>x</sub>).

### Procedural Background

Before work is begun on the modification of an existing facility that may emit air contaminants, the person planning the modification must obtain a permit amendment from the commission. This permit application is amendment of Air Quality Permit Number 7711A.

The permit application was received on December 19, 2008, and declared administratively complete on January 14, 2009. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI or first public notice) for this permit application was published on February 5, 2009, in English in - the *Dallas Observer* and in Spanish in *El Extra*. The Notice of Application and Preliminary Decision (NAPD or second public notice) for this permit application was published on March 11, 2010 in English in the *Dallas Observer*, and in Spanish in *El Extra*. Since this application was administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted in accordance with House Bill 801, 76th Legislature, 1999.

### **COMMENTS AND RESPONSES**

**COMMENT 1:** Commenter believes that air emissions from the plant may be causing, or have already caused, health-related illnesses that may be linked to cancer and other diseases. (David Hunter)

**RESPONSE 1:** Section 382.002 of the TCAA authorizes the commission to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare and physical property including aesthetic enjoyment of air resources by the public and maintenance of adequate visibility. The commission does not regulate on-site worker health, but rather ambient (off-property) air. Criteria pollutants are those pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established. The U.S. EPA, under authority in the Federal Clean Air Act (FCAA), established NAAQS as levels of air quality to protect public health and welfare. The plant will continue to emit PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, CO, and NO<sub>x</sub> as the criteria pollutants. The NAAQS is set by the U.S. EPA to protect sensitive members of the population, such as children and the elderly, after scientific review and public input. Every permit holder must comply with federal and state standards established for these pollutants to ensure the protectiveness of public health and welfare. The TCAA requires that the Applicant demonstrate use of best available control technology (BACT) and that the emissions are not detrimental to public health and welfare.

In the review of this application, the proposed emission changes were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that



existing health conditions will worsen or that there will be adverse health impacts from emission of PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, CO, and NO<sub>x</sub>. The Applicant will continue to use abatement devices and methods that meet, and in some cases exceed BACT criteria for asphalt processing and asphalt roofing facilities with consideration given to economic reasonableness and technical practicality. All emissions are vented to an incinerator that will capture and destroy PM/PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and hazardous air pollutants with greater than ninety-five percent efficiency. A review of the RACT, BACT, LAER Clearinghouse (RBLC), a database of nationwide permitted facilities was conducted to determine associated permitted emission limits and methods of abatement for similar sources. The review of the RBLC for asphalt processing and asphalt roofing plants resulted in one plant located in Ohio. The entry for the Ohio plant did show controls for abatement of PM/PM<sub>10</sub>, CO, and VOC. However, the review resulted in no other existing similar stationary source employing abatement devices or methods for control of SO<sub>2</sub>. Evaluation of the permitted limits for CO, VOC, and NO<sub>x</sub> from the Ohio plant indicates the Applicant's proposed limits are lower than those listed in the RBLC for the Ohio plant for these pollutants. Although the Applicant's proposed limit of PM/PM<sub>10</sub> is higher than the limits listed for the Ohio plant; the Applicant's proposed emission reduction plan for PM/PM<sub>10</sub> meets or exceeds BACT of recently reviewed and approved permits for abatement of PM/PM<sub>10</sub> from similar sources of emissions in the same industry type. Therefore, the Applicant's proposed emission limits represent BACT for all pollutants.

When necessary, the Toxicology Division reviews the non-criteria pollutants emitted from, the proposed facility, comparing the facilities proposed emissions to Effects Screening Levels (ESLs). ESLs are constituent-specific guideline concentrations used in the Executive Director's effects evaluation of constituent concentrations in air. These guidelines are derived by TCEQ's Toxicology Division and are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetation effects, or materials damage (e.g. corrosion). Health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. ESLs are established considering a generous safety factor to protect not only the general public, but also sensitive members of the general public. In the review of this application, the proposed health effects of asphalt vapors were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emissions of asphalt vapors.

Permit applications for new construction or modifications may be required to include air dispersion modeling to allow the TCEQ staff to evaluate the impact of emissions from the proposed facility upon the health, general welfare, and property of the public and for the Applicant to demonstrate compliance with all air quality rules and regulations and the intent of the TCAA. In this case, refined atmospheric dispersion modeling submitted in support of this application demonstrated that no cumulative concentration of any air contaminant will exceed

NAAQS established for criteria pollutants or ESLs established for non-criteria pollutants. Appropriate background concentrations for criteria pollutants were retrieved from monitoring stations nearby the plant site to determine total concentrations for comparison against the NAAQS. Additional Toxicology review of the non-criteria pollutant (asphalt vapors, a class of VOCs) was unnecessary because the total concentration was less than the ESL.

Results of the air dispersion modeling conducted by the applicant indicate the project's modeled maximum ground level concentration ( $GLC_{max}$ ) for 24-hour  $PM_{10}$  is  $68\mu g/m^3$ , which is above the 24-hour  $PM_{10}$  *de minimis* concentration threshold of  $5\mu g/m^3$ . In accordance with TCEQ Air Quality Modeling Guidelines, the next step requires the addition of the appropriate background concentration. In this case,  $56\mu g/m^3$  was added to the modeled concentration, resulting in a  $PM_{10}$   $GLC_{max}$  concentration value of  $124\mu g/m^3$ , which is below the NAAQS protectiveness limit of  $150\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $PM_{10}$  emissions were predicted to be  $18\mu g/m^3$ , which is above the  $PM_{10}$  *de minimis* concentration threshold of  $1\mu g/m^3$ , and thus guidance requires the addition of the appropriate background concentration. In this case, the appropriate background concentration of  $30\mu g/m^3$  was added to the modeled concentration, resulting in an annual  $GLC_{max}$  value of  $48\mu g/m^3$ , which is lower than the NAAQS protectiveness limit of  $50\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 1-hour  $NO_2$  to be  $83\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $10\mu g/m^3$ , and thus guidance requires the addition of the appropriate background concentration. The appropriate background concentration of  $103\mu g/m^3$  was added, resulting in a maximum concentration of  $186\mu g/m^3$ . This value is also below the NAAQS protectiveness limit of  $188\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $NO_2$  to be  $14\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $1\mu g/m^3$ . The modeled value at the  $GLC_{max}$  location was added to the appropriate background concentration of  $30\mu g/m^3$  resulting in a maximum concentration of  $44\mu g/m^3$ . This value is also below the NAAQS protectiveness limit of  $100\mu g/m^3$ .

To address the state property line standard for  $SO_2$ , the modeled 1-hour concentration was used as a surrogate for comparison against the 30-minute standard. Since there is no *de minimis* value, the  $GLC_{max}$  modeled value of  $676\mu g/m^3$  was compared directly against the TCEQ standard of  $1,021\mu g/m^3$  and found to be lower.

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 3-hour  $SO_2$  was found to be  $532\mu g/m^3$  which is above the *de minimis* concentration threshold of  $25\mu g/m^3$ . Therefore, the appropriate background concentration of  $24\mu g/m^3$  was added, resulting in a maximum concentration of  $556\mu g/m^3$ . This value is also below the NAAQS protectiveness limit of  $1,300\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 24-hour  $SO_2$  to be  $329\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $5\mu g/m^3$ . Therefore, the modeled value at the  $GLC_{max}$  location was added to the appropriate background concentration of  $13\mu g/m^3$  resulting in a maximum concentration of  $342\mu g/m^3$ . This value is also below the NAAQS protectiveness limit of  $365\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $SO_2$  to be  $39\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $1\mu g/m^3$ . Therefore, the modeled value at the  $GLC_{max}$  location was added to the appropriate background concentration of  $3\mu g/m^3$ , resulting in a maximum concentration of  $42\mu g/m^3$ . This value is also below the NAAQS protectiveness limit of  $80\mu g/m^3$ .

Asphalt vapors from the facilities and operating procedure were evaluated on a short-term and a long-term basis for comparison to the ESL. On a 1-hour basis, the modeled value at the  $GLC_{max}$  location was found to be  $336\mu g/m^3$ . This value is below the TCEQ Toxicology Division's established limitation of  $350\mu g/m^3$  required for protectiveness with respect to the protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility. On an annual basis, the modeled value at the  $GLC_{max}$  location was found to be  $25\mu g/m^3$ . This value is also below the TCEQ Toxicology Section's established limitation of  $35\mu g/m^3$  required for protectiveness with respect to the protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility.

All other contaminants were evaluated to be below the respective *de minimis* levels corresponding to the contaminant and the time averaging period required by the NAAQS to determine protectiveness.

In addition to meeting the above federal and state standards and guidelines, applicants must comply with 30 TAC § 101.4, which prohibits nuisance conditions. Specifically, that rule states that "no person shall discharge from any source" air contaminants which are or may "tend to be injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facilities at the plant are operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the plant is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. The TCEQ has procedures in place for accepting environmental complaints from the general public but now has a new tool for bringing potential

environmental problems to light. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law and the information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us) (under Publications, search for document no. 278).

### CHANGES MADE IN RESPONSE TO COMMENT

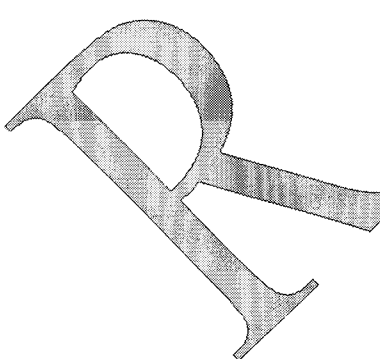
No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director  
Environmental Law Division



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Erin Selvera, Staff Attorney  
Environmental Law Division  
State Bar Number 24043385  
PO Box 13087, MC 173  
Austin, Texas 78711-3087  
(512) 239-6033

Representing the  
Executive Director of the  
Texas Commission on  
Environmental Quality

**Javier Galvan - BMC RTC - Permit No. 7711A**

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**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 8/10/2010 3:09 PM  
**Subject:** BMC RTC - Permit No. 7711A

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Erin,

I have composed the following:

Further evaluation of the permitted limits of CO, VOC, and NOx from the Ohio plant resulted in the Applicant's proposed limits being lower than those listed in the RBLC for the Ohio plant. The Applicant's proposed limit of PM/PM10 is higher than what is listed for the Ohio plant; however, the Applicant's proposed emission reduction plan for PM/PM10 meets or exceeds BACT of recently reviewed and approved permits for abatement of PM/PM10 from similar sources of emissions in the same industry type.

Of course, change/modify it as you see necessary. Thanks.

Javier



http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104093&Pollutant\_ID=2298&PermitControlEquipment\_ID=439286  
Last Updated on Tuesday, August 10, 2010

## Technology Transfer Network

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## Pollutant Information

Click on the Process Information button to see more information about the process associated with this pollutant.

Or click on the Process List button to return to the list of processes.

<a href="#">RBLC Home</a>	<a href="#">New Search</a>	<a href="#">Search Results</a>	<a href="#">Facility Information</a>	<a href="#">Process List</a>	<a href="#">Process Information</a>
<a href="#">Pollutant Information</a>					

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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** ASPHALT BLOWING STILL/CONVERTORS (3)

**Pollutant:** Particulate Matter (PM)

**CAS Number:** PM

**Pollutant Group (s):** Particulate Matter (PM),

**Substance Registry System:** [Particulate Matter \(PM\)](#)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** THERMAL INCINERATOR.

**Test Method:** Unspecified

[EPA/CAAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:** 95.000

**Compliance Verified:** Yes

#### EMISSION LIMITS:

**Case-by-Case Basis:**

**Other Applicable Requirements:** NSPS , MACT , SIP

**Other Factors Influence Decision:** Unknown

**Emission Limit 1:** 3.5700 LB/H EACH STILL

**Emission Limit 2:** 15.6400 T/YR EACH STILL, PER ROLLING 12-MONTHS

**Standard Emission Limit:** 0.6000 LB/K LB ASPHALT SHGL

#### COST DATA:

**Cost Verified?** No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Pollutant Notes:**

LIMITS ARE FOR EACH OF 17.9 TON/H UNITS. LIMIT FOR 15.4 T/H UNIT IS 3.07 LB/H AND 13.45 T/ROLLING 12-MONTHS. ADDITIONAL LIMIT FROM 60 SUBPART UU: 0.67 KG PM/MG OF ASPHALT CHARGED TO STILL WHEN CATALYST ADDED.

PM → 55.36



http://cfpub.epa.gov/rblc/index.cfm? action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104091&Pollutant\_ID=2298&PermitControlEquipmentId=632075  
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Or click on the Process List button to return to the list of processes.

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[Pollutant Information](#)

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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** OXIDIZED ASPHALT FIXED ROOF STORAGE TANKS (3)

**Pollutant:** Particulate Matter (PM)

**CAS Number:** PM

**Pollutant Group (s):** Particulate Matter (PM),

**Substance Registry System:** Particulate Matter (PM)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** P

**P2/Add-on Description:** FIXED ROOF TANK

**Test Method:** Unspecified

[EPA/CAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:** 95.000

**Compliance Verified:** Yes

#### EMISSION LIMITS:

**Case-by-Case Basis:**

**Other Applicable Requirements:** SIP

**Other Factors Influence Decision:** Unknown

**Emission Limit 1:** 0.0100 LB/H EACH TANK

**Emission Limit 2:** 0.0600 T/YR EACH TANK

**Standard Emission Limit:** 0 NOT AVAILABLE

#### COST DATA:

**Cost Verified?** No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Pollutant Notes:** LIMITS FOR EACH TANK ARE THE SAME REGARDLESS OF THE SIZE TANK.



http://cfpub.epa.gov/rblc/index.cfm?  
action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104095&Pollutant\_ID=2298&PermitControlEquipmentId=439896  
Last updated on Tuesday, August 10, 2010

## Technology Transfer Network

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## Pollutant Information

Click on the Process Information button to see more information about the process associated with this pollutant.

Or click on the Process List button to return to the list of processes.

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[Pollutant Information](#)

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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** GROUP 1 ASPHALT LOADING RACK #3

**Pollutant:** Particulate Matter (PM)

**CAS Number:** PM

**Pollutant Group (s):** Particulate Matter (PM),

**Substance Registry System:** [Particulate Matter \(PM\)](#)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** REGENERATIVE THERMAL OXIDIZER

**Test Method:** Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:** 95.000

**Compliance Verified:** Yes

#### EMISSION LIMITS:

##### Case-by-Case Basis:

**Other Applicable Requirements:** SIP

**Other Factors Influence Decision:** Unknown

**Emission Limit 1:** 4.6800 LB/H

**Emission Limit 2:** 1.8100 T/YR PER ROLLING 12-MONTHS

**Standard Emission Limit:** 0

#### COST DATA:

**Cost Verified?** No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Pollutant Notes:**





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**FINAL**

**RBLC ID:** OH-0288  
**Corporate/Company:** OWENS CORNING  
**Facility Name:** OWENS CORNING MEDINA  
**Process:** GROUP 2 ASPHALT LOADING RACK #4

**Pollutant:** Particulate Matter (PM)

**CAS Number:** PM

**Pollutant Group** Particulate Matter (PM),  
(s):

**Substance Registry System:** Particulate Matter (PM)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** THERMAL INCINERATOR

**Test Method:** Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:** 95.000

**Compliance Verified:** Yes

**EMISSION LIMITS:**

Case-by-Case Basis:

**Other Applicable Requirements:** SIP

**Other Factors Influence Decision:** Unknown

**Emission Limit 1:** 5.4400 LB/H

**Emission Limit 2:** 5.6900 T/YR PER ROLLING 12-MONTHS

**Standard Emission Limit:** 0

**COST DATA:**

**Cost Verified?** No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Pollutant Notes:**



http://cfpub.epa.gov/rblc/index.cfm?

action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104094&Pollutant\_ID=2298&ReportControlEquipmentID=632895

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**FINAL**

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** THERMAL INCINERATOR, PCC

**Pollutant:** Particulate Matter (PM)

**CAS Number:** PM

**Pollutant Group (s):** Particulate Matter (PM),

**Substance Registry System:** Particulate Matter (PM)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:**

**Test Method:**

Unspecified

[EPA/DAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:**

0

**Compliance Verified:**

Yes

**EMISSION LIMITS:**

**Case-by-Case Basis:**

**Other Applicable Requirements:** SIP , NSPS , MACT

**Other Factors Influence Decision:** Unknown

**Emission Limit 1:** 0.1700 LB/H

**Emission Limit 2:** 0.7600 T/YR PER ROLLING 12-MONTHS

**Standard Emission Limit:** 0 NOT AVAILABLE

**COST DATA:**

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Pollutant Notes:** CONTROL DEVICE.



http://cfpub.epa.gov/rblc/index.cfm? action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104093&Pollutant\_ID=1498&Ref=Control\_Equipment\_ID=1039000  
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**FINAL**

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** ASPHALT BLOWING STILL/CONVERTORS (3)

**Pollutant:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Pollutant Group (s):** InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM),

**Substance Registry System:** Nitrogen Oxides (NOx)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:**

**Test Method:** Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:** 0

**Compliance Verified:** Unknown

#### EMISSION LIMITS:

**Case-by-Case Basis:**

**Other Applicable Requirements:** SIP

**Other Factors Influence Decision:** Unknown

**Emission Limit 1:** 2.8500 LB/H EACH STILL

**Emission Limit 2:** 12.4900 T/YR EACH STILL

**Standard Emission Limit:** 0

#### COST DATA:

**Cost Verified?** No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Pollutant Notes:** LIMITS ARE FOR EACH OF 17.9 TON/H UNITS. LIMIT FOR 15.4 T/H UNIT IS 2.47 LB/H AND 10.80 T/YR.

$NO_x \Rightarrow 45.03$



http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104094&Pollutant\_ID=1498&PermitControlEquipment\_ID=439896  
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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** THERMAL INCINERATOR, PCC

**Pollutant:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Pollutant Group (s):** InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM),

**Substance Registry System:** Nitrogen Oxides (NOx)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:**

**Test Method:**

Unspecified

[EPA/DOAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:**

0

**Compliance Verified:**

Unknown

**EMISSION LIMITS:**

**Case-by-Case Basis:**

**Other Applicable Requirements:**

SIP

**Other Factors Influence Decision:**

Unknown

**Emission Limit 1:**

1.7300 LB/H

**Emission Limit 2:**

7.5600 T/YR PER ROLLING 12-MONTHS

**Standard Emission Limit:**

0

**COST DATA:**

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:**

2005

**Cost Effectiveness:**

0 \$/ton

**Incremental Cost Effectiveness:**

0 \$/ton

**Pollutant Notes:**

CONTROL DEVICE



http://cfpub.epa.gov/rblc/index.cfm?

action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104093&Pollutant\_ID=488&PermitControl\_Equipment\_ID=432893

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## Pollutant Information

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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** ASPHALT BLOWING STILL/CONVERTORS (3)

**Pollutant:** Carbon Monoxide

**CAS Number:** 630-08-0

**Pollutant Group (s):** InOrganic Compounds,

**Substance Registry System:** [Carbon Monoxide](#)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** THERMAL INCINERATOR

**Test Method:** Unspecified

[EPA/DOE Methods](#)

[All Other Methods](#)

**Percent Efficiency:** 95.000

**Compliance Verified:** Unknown

#### EMISSION LIMITS:

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** SIP

**Other Factors Influence Decision:** Unknown

**Emission Limit 1:** 17.6000 LB/H EACH STILL

**Emission Limit 2:** 77.1000 T/YR EACH STILL, PER ROLLING 12-MONTHS

**Standard Emission Limit:** 0

#### COST DATA:

**Cost Verified?** No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Pollutant Notes:** LIMITS ARE FOR EACH OF 17.9 TON/H UNITS. LIMIT FOR 15.4 T/H UNIT IS 15.13 LB/H AND 66.26 T/ROLLING 12-MONTHS

CO -> 236.53 tpy



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**FINAL**

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** OXIDIZED ASPHALT FIXED ROOF STORAGE TANKS (3)

**Pollutant:** Carbon Monoxide

**CAS Number:** 630-08-0

**Pollutant Group (s):** InOrganic Compounds,

**Substance Registry System:** Carbon Monoxide

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** THERMAL INCINERATOR

**Test Method:**

Unspecified

[EPA/CAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:** 95.000

**Compliance Verified:** Unknown

#### EMISSION LIMITS:

**Case-by-Case Basis:** BACT-PSD

**Other Applicable Requirements:** SIP

**Other Factors Influence Decision:** Unknown

**Emission Limit 1:** 0.0200 LB/H EACH TANK

**Emission Limit 2:** 0.0700 T/YR EACH TANK, PER ROLLING 12-MONTHS

**Standard Emission Limit:** 0

#### COST DATA:

**Cost Verified?** No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton

**Pollutant Notes:** LIMITS FOR EACH TANK ARE THE SAME REGARDLESS OF THE SIZE TANK. ALSO SEE EMISSIONS FROM THE MULTIPLE-SOURCE CONTROL DEVICE: JZ THERMAL INCINERATOR.



http://cfpub.epa.gov/rblc/index.cfm?

action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104095&Pollutant\_ID=488&Permit\_Control\_Equipment\_Id=439303

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**FINAL**

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** GROUP 1 ASPHALT LOADING RACK #3

**Pollutant:** Carbon Monoxide

**CAS Number:** 630-08-0

**Pollutant Group (s):** InOrganic Compounds,

**Substance Registry System:** [Carbon Monoxide](#)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** REGENERATIVE THERMAL INCINERATOR OPERATED WITH ELECTRICITY

<b>Test Method:</b>	Unspecified	<a href="#">EPA/QAR Methods</a>	<a href="#">All Other Methods</a>
<b>Percent Efficiency:</b>	95.000		
<b>Compliance Verified:</b>	Unknown		
<b>EMISSION LIMITS:</b>			
<b>Case-by-Case Basis:</b>	BACT-PSD		
<b>Other Applicable Requirements:</b>	SIP		
<b>Other Factors Influence Decision:</b>	Unknown		
<b>Emission Limit 1:</b>	0.2500 LB/H		
<b>Emission Limit 2:</b>	0.1700 T/YR PER ROLLING 12-MONTHS		
<b>Standard Emission Limit:</b>	0		
<b>COST DATA:</b>			
<b>Cost Verified?</b>	No		
<b>Dollar Year Used in Cost Estimates:</b>	2005		
<b>Cost Effectiveness:</b>	0 \$/ton		
<b>Incremental Cost Effectiveness:</b>	0 \$/ton		
<b>Pollutant Notes:</b>			



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action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104096&Pollutant\_ID=488&Control\_Equipment\_ID=1039810

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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** GROUP 2 ASPHALT LOADING RACK #4

**Pollutant:** Carbon Monoxide

**CAS Number:** 630-08-0

**Pollutant Group (s):** Inorganic Compounds,

**Substance Registry System:** [Carbon Monoxide](#)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:** THERMAL INCINERATOR

**Test Method:**

Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:**

95.000

**Compliance Verified:**

Unknown

**EMISSION LIMITS:**

**Case-by-Case Basis:**

BACT-PSD

**Other Applicable Requirements:**

SIP

**Other Factors Influence Decision:**

Unknown

**Emission Limit 1:**

0.5000 LB/H

**Emission Limit 2:**

0.5200 T/YR PER ROLLING 12-MONTHS

**Standard Emission Limit:**

0

**COST DATA:**

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:**

0 \$/ton

**Incremental Cost Effectiveness:**

0 \$/ton

**Pollutant Notes:**





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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** THERMAL INCINERATOR, PCC

**Pollutant:** Carbon Monoxide

**CAS Number:** 630-08-0

**Pollutant Group (s):** InOrganic Compounds,

**Substance Registry System:** [Carbon Monoxide](#)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:**

**Test Method:**

Unspecified

[EPA/DOAR Methods](#)

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**Percent Efficiency:**

0

**Compliance Verified:**

Unknown

**EMISSION LIMITS:**

**Case-by-Case Basis:**

BACT-PSD

**Other Applicable Requirements:**

SIP

**Other Factors Influence Decision:**

Unknown

**Emission Limit 1:**

0.9900 LB/H

**Emission Limit 2:**

4.3300 T/YR PER ROLLING 12-MONTHS

**Standard Emission Limit:**

0

**COST DATA:**

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:**

0 \$/ton

**Incremental Cost Effectiveness:**

0 \$/ton

**Pollutant Notes:**

CONTROL DEVICE. PROVIDES 95% CONTROL OF CO FROM CONTROLLED SOURCES.



http://cfpub.epa.gov/rblc/index.cfm?

action=PermitDetail.PollutantInfo&Facility\_ID=261978&Process\_ID=104093&Pollutant\_ID=2188&PermitControlEquipmentID=1439890

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**FINAL**

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** ASPHALT BLOWING STILL/CONVERTORS (3)

**Pollutant:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Pollutant Group (s):** Volatile Organic Compounds (VOC),

**Substance Registry System:** Volatile Organic Compounds (VOC)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** THERMAL INCINERATOR

**Test Method:**

Unspecified

[EPA/QAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:**

95.000

**Compliance Verified:**

Unknown

#### EMISSION LIMITS:

**Case-by-Case Basis:**

BACT-PSD

**Other Applicable Requirements:**

MACT, SIP

**Other Factors Influence Decision:**

Unknown

**Emission Limit 1:**

2.0200 LB/H EACH STILL

**Emission Limit 2:**

8.8500 T/YR EACH STILL, PER ROLLING 12-MONTHS

**Standard Emission Limit:**

0

#### COST DATA:

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:**

0 \$/ton

**Incremental Cost Effectiveness:**

0 \$/ton

**Pollutant Notes:**

LIMITS ARE FOR EACH OF 17.9 TON/H UNITS. LIMIT FOR 15.4 T/H UNIT IS 1.74LB/H AND 7.61 T/ROLLING 12-MONTHS SEE MACT LIMIT FOR HYDROCARBONS (ORGANICS).

VOC ⇒ 53.76 kg



http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104091&Pollutant\_ID=2188&PermitControlEquipment\_ID=1039870  
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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** OXIDIZED ASPHALT FIXED ROOF STORAGE TANKS (3)

**Pollutant:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Pollutant Group (s):** Volatile Organic Compounds (VOC),

**Substance Registry System:** Volatile Organic Compounds (VOC)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** THERMAL INCINERATOR

**Test Method:**

Unspecified

[EPA/DOAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:**

95.000

**Compliance Verified:**

Unknown

**EMISSION LIMITS:**

**Case-by-Case Basis:**

BACT-PSD

**Other Applicable Requirements:**

SIP

**Other Factors Influence Decision:**

Unknown

**Emission Limit 1:**

0.0500 LB/H EACH TANK

**Emission Limit 2:**

0.2100 T/YR EACH TANK, PER ROLLING 12-MONTHS

**Standard Emission Limit:**

0

**COST DATA:**

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:**

2005

**Cost Effectiveness:**

0 \$/ton

**Incremental Cost Effectiveness:**

0 \$/ton

**Pollutant Notes:**

LIMITS FOR EACH TANK ARE THE SAME REGARDLESS OF THE SIZE TANK. ALSO SEE EMISSIONS FROM THE MULTIPLE-SOURCE CONTROL DEVICE: JZ THERMAL INCINERATOR.



http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104095&Pollutant\_ID=2188&PermitControlEquipmentId=139896  
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FINAL

**RBLC ID:** OH-0288  
**Corporate/Company:** OWENS CORNING  
**Facility Name:** OWENS CORNING MEDINA  
**Process:** GROUP 1 ASPHALT LOADING RACK #3

**Pollutant:** Volatile Organic Compounds  
(VOC)

**CAS Number:** VOC

**Pollutant Group (s):** Volatile Organic Compounds (VOC), **Substance Registry System:** Volatile Organic Compounds (VOC)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** A

**P2/Add-on Description:** REGENERATIVE THERMAL INCINERATOR OPERATED WITH ELECTRICITY

<b>Test Method:</b>	Unspecified	<a href="#">EPA/DOAR Methods</a>	<a href="#">All Other Methods</a>
<b>Percent Efficiency:</b>	95.000		
<b>Compliance Verified:</b>	Unknown		
<b>EMISSION LIMITS:</b>			
Case-by-Case Basis:	BACT-PSD		
Other Applicable Requirements:	MACT , SIP		
Other Factors Influence Decision:	Unknown		
Emission Limit 1:	16.6000 LB/H		
Emission Limit 2:	6.4200 T/YR PER ROLLING 12-MONTHS		
Standard Emission Limit:	0		
<b>COST DATA:</b>			
Cost Verified?	No		
Dollar Year Used in Cost Estimates:	2005		
Cost Effectiveness:	0 \$/ton		
Incremental Cost Effectiveness:	0 \$/ton		
Pollutant Notes:	SEE MACT LIMIT FOR HYDROCARBONS (ORGANICS).		



Technology Transfer Network  
Clean Air Technology Center - RACT/BACT/LAER Clearinghouse

You are here: [EPA Home](#) [Air & Radiation](#) [TTNWeb - Technology Transfer Network](#) [Clean Air Technology Center](#) [RACT/BACT/LAER Clearinghouse](#) [RBLC Basic Search](#) [RBLC Search Results](#) [Pollutant Information](#)

## Pollutant Information

Click on the Process Information button to see more information about the process associated with this pollutant.

Or click on the Process List button to return to the list of processes.

[RBLC Home](#)
[New Search](#)
[Search Results](#)
[Facility Information](#)
[Process List](#)
[Process Information](#)

[Pollutant Information](#)

[Help](#)

FINAL

RBLC ID: OH-0288

Corporate/Company: OWENS CORNING

Facility Name: OWENS CORNING MEDINA

Process: GROUP 2 ASPHALT LOADING RACK #4

Pollutant: Volatile Organic Compounds  
(VOC)

CAS Number: VOC

Pollutant Group (s): Volatile Organic Compounds  
(VOC),

Substance Registry System: [Volatile Organic Compounds \(VOC\)](#)

Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible: A

P2/Add-on Description: THERMAL INCINERATOR

Test Method:

Unspecified

[EPA/DAR Methods](#)

[All Other Methods](#)

Percent Efficiency:

0

Compliance Verified:

Unknown

EMISSION LIMITS:

Case-by-Case Basis:

BACT-PSD

Other Applicable Requirements:

SIP

Other Factors Influence Decision:

Unknown

Emission Limit 1:

19.2900 LB/H

Emission Limit 2:

20.1600 T/YR PER ROLLING 12-MONTHS

Standard Emission Limit:

0

COST DATA:

Cost Verified?

No

Dollar Year Used in Cost Estimates:

2005

Cost Effectiveness:

0 \$/ton

Incremental Cost Effectiveness:

0 \$/ton

Pollutant Notes:

GROUP 2 ASPHALT LOADING RACK EXEMPT FROM MACT  
REQUIREMENTS IN TABLE 1

## Javier Galvan - BMC RTC

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 8/9/2010 5:51 PM  
**Subject:** BMC RTC  
**Attachments:** RTC\_143272 8-4-2010.doc

---

Javier,  
Attached is the revised version. I have 1 last comment and 1 question. Feel free to call me if you want to discuss.  
Thanks,

Erin

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
Phone 512-239-6033  
Fax 512-239-0606

This email may contain Attorney Work Product and/or Privileged Attorney-Client Confidential Information. DO NOT RELEASE OUTSIDE TCEQ WITHOUT EXPRESS PERMISSION OF THE AUTHOR OR THE OFFICE OF LEGAL SERVICES.

 Please consider the environment before printing this e-mail

**TCEQ AIR QUALITY PERMIT NUMBER 7711A**

<b>APPLICATION BY</b>	<b>§</b>	<b>BEFORE THE</b>
<b>BUILDING MATERIALS</b>	<b>§</b>	
<b>CORPORATION OF AMERICA</b>	<b>§</b>	
<b>ASPHALT ROOFING PRODUCTION</b>	<b>§</b>	<b>TEXAS COMMISSION ON</b>
<b>FACILITY</b>	<b>§</b>	
<b>DALLAS, DALLAS COUNTY</b>	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>
	<b>§</b>	

**EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT**

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from the following persons: David Hunter. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Office of Public Assistance at 1-800-687-4040. General information about the TCEQ can be found at our website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us).

**BACKGROUND**

Description of Facilities

Building Materials Corporation of America (the Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), §382.0518. Air Quality Permit Number 7711A will authorize the modification of an existing facility that may emit air contaminants.

This permit will authorize the Applicant to modify existing operations to resolve deviations that resulted from stack testing. The Applicant will also be consolidating by incorporation, Standard Permit Registration No. 81652 as part of the amendment, and correcting permit representations for existing facilities and for facilities that no longer exist at the plant site. All permit changes will reflect current operating conditions for all permitted facilities at the site. There are no proposed production rate increases for asphalt shingles, physical modifications to existing facilities, or new construction of facilities. Building Materials Corporation of America has requested to increase asphalt throughput rates for Lines 1 and 3. However the increase in asphalt throughput will not result in an increase in the production (output) of asphalt shingles. The facilities are located at 2600 Singleton Blvd Dallas, Dallas County. Contaminants authorized under this permit include particulate matter, including particulate matter less than 10 microns in

**Comment [e1]:** Just checking to make sure this word is ok.

diameter and particulate matter less than 2.5 microns in diameter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NO<sub>x</sub>).

#### Procedural Background

Before work is begun on the modification of an existing facility that may emit air contaminants, the person planning the modification must obtain a permit amendment from the commission. This permit application is amendment of Air Quality Permit Number 7711A.

The permit application was received on December 19, 2008, and declared administratively complete on January 14, 2009. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI or first public notice) for this permit application was published on February 5, 2009, in English in - the *Dallas Observer* and in Spanish in *El Extra*. The Notice of Application and Preliminary Decision (NAPD or second public notice) for this permit application was published on March 11, 2010 in English in the *Dallas Observer*, and in Spanish in *El Extra*. Since this application was administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted in accordance with House Bill 801, 76th Legislature, 1999.

#### **COMMENTS AND RESPONSES**

**COMMENT 1:** Commenter believes that air emissions from the plant may be causing, or have already caused, health-related illnesses that may be linked to cancer and other diseases. (David Hunter)

**RESPONSE 1:** Section 382.002 of the TCAA authorizes the commission to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare and physical property including aesthetic enjoyment of air resources by the public and maintenance of adequate visibility. The commission does not regulate on-site worker health, but rather ambient (off-property) air. Criteria pollutants are those pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established. The U.S. EPA, under authority in the Federal Clean Air Act (FCAA), established NAAQS as levels of air quality to protect public health and welfare. The plant will continue to emit PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, CO, and NO<sub>x</sub> as the criteria pollutants. The NAAQS is set by the U.S. EPA to protect sensitive members of the population, such as children and the elderly, after scientific review and public input. Every permit holder must comply with federal and state standards established for these pollutants to ensure the protectiveness of public health and welfare. The TCAA requires that the Applicant demonstrate use of best available control technology (BACT) and that the emissions are not detrimental to public health and welfare.

In the review of this application, the proposed emission changes were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that



existing health conditions will worsen or that there will be adverse health impacts from emission of PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, CO, and NO<sub>x</sub>. The Applicant will continue to use abatement devices and methods that meet, and in some cases exceed BACT criteria for asphalt processing and asphalt roofing facilities with consideration given to economic reasonableness and technical practicality. All emissions are vented to an incinerator that will capture and destroy PM/PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and hazardous air pollutants with greater than ninety-five percent efficiency. A review of the RACT, BACT, LAER Clearinghouse (RBLC), a database of nationwide permitted facilities was conducted to determine associated permitted emission limits and methods of abatement for similar sources. The review of the RBLC for asphalt processing and asphalt roofing plants resulted in one plant located in Ohio. The Ohio plant did show controls for abatement of PM/PM<sub>10</sub>, CO, and VOC. However, the review resulted in no other existing similar stationary source employing abatement devices or methods for control of SO<sub>2</sub>. Evaluation of the proposed emission limit of CO resulted in the Applicant's proposed limit residing within the range of recently reviewed and approved permit limits for combustion sources also emitting CO. It is expected that the majority of emitted CO will emanate from the incinerator.

When necessary, the Toxicology Division reviews the non-criteria pollutants emitted from, the proposed facility, comparing the facilities proposed emissions to Effects Screening Levels (ESLs). ESLs are constituent-specific guideline concentrations used in the Executive Director's effects evaluation of constituent concentrations in air. These guidelines are derived by TCEQ's Toxicology Division and are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetation effects, or materials damage (e.g. corrosion). Health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. ESLs are established considering a generous safety factor to protect not only the general public, but also sensitive members of the general public. In the review of this application, the proposed health effects of asphalt vapors were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emissions of asphalt vapors.

Permit applications for new construction or modifications may be required to include air dispersion modeling to allow the TCEQ staff to evaluate the impact of emissions from the proposed facility upon the health, general welfare, and property of the public and for the Applicant to demonstrate compliance with all air quality rules and regulations and the intent of the TCAA. In this case, refined atmospheric dispersion modeling submitted in support of this application demonstrated that no cumulative concentration of any air contaminant will exceed NAAQS established for criteria pollutants or ESLs established for non-criteria pollutants. Appropriate background concentrations for criteria pollutants were retrieved from monitoring stations nearby the plant site to determine total concentrations for comparison against the

**Comment [e2]:** This begs the question for PM NOx and VOC. How did this plant compare to others?

NAAQS. Additional Toxicology review of the non-criteria pollutant (asphalt vapors, a class of VOCs) was unnecessary because the total concentration was less than the ESL.

Results of the air dispersion modeling conducted by the applicant indicate the project's modeled maximum ground level concentration ( $GLC_{max}$ ) for 24-hour  $PM_{10}$  is  $68\mu g/m^3$ , which is above the 24-hour  $PM_{10}$  *de minimis* concentration threshold of  $5\mu g/m^3$ . In accordance with TCEQ Air Quality Modeling Guidelines, the next step requires the addition of the appropriate background concentration. In this case,  $56\mu g/m^3$  was added to the modeled concentration, resulting in a  $PM_{10}$   $GLC_{max}$  concentration value of  $124\mu g/m^3$ , which is below the NAAQS protectiveness limit of  $150\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $PM_{10}$  emissions were predicted to be  $18\mu g/m^3$ , which is above the  $PM_{10}$  *de minimis* concentration threshold of  $1\mu g/m^3$ , and thus guidance requires the addition of the appropriate background concentration. In this case, the appropriate background concentration of  $30\mu g/m^3$  was added to the modeled concentration, resulting in an annual  $GLC_{max}$  value of  $48\mu g/m^3$ , which is lower than the NAAQS protectiveness limit of  $50\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 1-hour  $NO_2$  to be  $83\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $10\mu g/m^3$ , and thus guidance requires the addition of the appropriate background concentration. The appropriate background concentration of  $103\mu g/m^3$  was added, resulting in a maximum concentration of  $186\mu g/m^3$ . This value is also below the NAAQS protectiveness limit of  $188\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for annual  $NO_2$  to be  $14\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $1\mu g/m^3$ . The modeled value at the  $GLC_{max}$  location was added to the appropriate background concentration of  $30\mu g/m^3$  resulting in a maximum concentration of  $44\mu g/m^3$ . This value is also below the NAAQS protectiveness limit of  $100\mu g/m^3$ .

To address the state property line standard for  $SO_2$ , the modeled 1-hour concentration was used as a surrogate for comparison against the 30-minute standard. Since there is no *de minimis* value, the  $GLC_{max}$  modeled value of  $676\mu g/m^3$  was compared directly against the TCEQ standard of  $1,021\mu g/m^3$  and found to be lower.

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 3-hour  $SO_2$  was found to be  $532\mu g/m^3$  which is above the *de minimis* concentration threshold of  $25\mu g/m^3$ . Therefore, the appropriate background concentration of  $24\mu g/m^3$  was added, resulting in a maximum concentration of  $556\mu g/m^3$ . This value is also below the NAAQS protectiveness limit of  $1,300\mu g/m^3$ .

Results of the air dispersion modeling indicate the project's modeled  $GLC_{max}$  for 24-hour  $SO_2$  to be  $329\mu g/m^3$ , which is above the *de minimis* concentration threshold of  $5\mu g/m^3$ . Therefore, the modeled value at the  $GLC_{max}$  location was added to the appropriate background concentration of

$13\mu\text{g}/\text{m}^3$  resulting in a maximum concentration of  $342\mu\text{g}/\text{m}^3$ . This value is also below the NAAQS protectiveness limit of  $365\mu\text{g}/\text{m}^3$ .

Results of the air dispersion modeling indicate the project's modeled  $\text{GLC}_{\text{max}}$  for annual  $\text{SO}_2$  to be  $39\mu\text{g}/\text{m}^3$ , which is above the *de minimis* concentration threshold of  $1\mu\text{g}/\text{m}^3$ . Therefore, the modeled value at the  $\text{GLC}_{\text{max}}$  location was added to the appropriate background concentration of  $3\mu\text{g}/\text{m}^3$ , resulting in a maximum concentration of  $42\mu\text{g}/\text{m}^3$ . This value is also below the NAAQS protectiveness limit of  $80\mu\text{g}/\text{m}^3$ .

Asphalt vapors from the facilities and operating procedure were evaluated on a short-term and a long-term basis for comparison to the ESL. On a 1-hour basis, the modeled value at the  $\text{GLC}_{\text{max}}$  location was found to be  $336\mu\text{g}/\text{m}^3$ . This value is below the TCEQ Toxicology Division's established limitation of  $350\mu\text{g}/\text{m}^3$  required for protectiveness with respect to the protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility. On an annual basis, the modeled value at the  $\text{GLC}_{\text{max}}$  location was found to be  $25\mu\text{g}/\text{m}^3$ . This value is also below the TCEQ Toxicology Section's established limitation of  $35\mu\text{g}/\text{m}^3$  required for protectiveness with respect to the protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility.

All other contaminants were evaluated to be below the respective *de minimis* levels corresponding to the contaminant and the time averaging period required by the NAAQS to determine protectiveness.

In addition to meeting the above federal and state standards and guidelines, applicants must comply with 30 TAC § 101.4, which prohibits nuisance conditions. Specifically, that rule states that "no person shall discharge from any source" air contaminants which are or may "tend to be injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facilities at the plant are operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the plant is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. The TCEQ has procedures in place for accepting environmental complaints from the general public but now has a new tool for bringing potential environmental problems to light. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law and the information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may

eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us) (under Publications, search for document no. 278).

#### CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director  
Environmental Law Division

Erin Selvera, Staff Attorney  
Environmental Law Division  
State Bar Number 24043385  
PO Box 13087, MC 173  
Austin, Texas 78711-3087  
(512) 239-6033

Representing the  
Executive Director of the  
Texas Commission on  
Environmental Quality

**Javier Galvan - Re: BMC revised RTC - Permit No. 7711A**

---

**From:** Stephanie Howell  
**To:** Galvan, Javier; Selvera, Erin  
**Date:** 8/3/2010 3:05 PM  
**Subject:** Re: BMC revised RTC - Permit No. 7711A  
**CC:** Gould, Mike

---

Erin,

This RTC is ready to be filed once y'all are ok with it. We have Director approval.

Stephanie

>>> Javier Galvan 8/3/2010 2:58 PM >>>

Erin,

I have received comments from APD upper management regarding the comments that you provided and that I incorporated into the RTC. I have attached for your review the revised RTC with APD upper management's comments incorporated into the RTC. Thank you.

Javier

**Javier Galvan - BMC revised RTC - Permit No. 7711A**

---

**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 8/3/2010 2:58 PM  
**Subject:** BMC revised RTC - Permit No. 7711A  
**CC:** Gould, Mike; Howell, Stephanie  
**Attachments:** RTC\_143272.doc

---

Erin,

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Javier

**Javier Galvan - Re: RTC for BMC - Permit No. 7711A**

---

**From:** Jayme Sadlier  
**To:** Galvan, Javier; Wilson, Mike  
**Date:** 8/3/2010 12:01 PM  
**Subject:** Re: RTC for BMC - Permit No. 7711A  
**CC:** Gould, Mike; Howell, Stephanie  
**Attachments:** RTC\_143272\_jrs\_08-03-10.doc

---

Javier, my edits are attached. Thanks, Jayme

>>> Javier Galvan 7/29/2010 10:45 AM >>>  
Mike and Jayme,

I have attached the RTC with comments from the staff attorney for the amendment application for Permit No. 7711A, Building Materials Corporation of America, located in Dallas, Dallas County.

I have also attached my revised RTC with the staff attorney's comments incorporated into it. Thank you.

Javier

*✓*  
Gould & Howell  
when sending RTC  
to Erin

TCEQ AIR QUALITY PERMIT NUMBER 7711A

APPLICATION BY	§	BEFORE THE
	§	
Building Materials Corporation of America	§	TEXAS COMMISSION ON
Asphalt Roofing Production Facility	§	
Dallas, Dallas County	§	ENVIRONMENTAL QUALITY

✓  
Comment [j1]: The left side should be all CAPs too

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**BACKGROUND**

Description of Facilities

Building Materials Corporation of America (the Applicant BMC) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), §382.0518. This Air Quality Permit Number 7711A will authorize the modification of an existing facility that may emit air contaminants.

✓  
This permit will authorize the Applicant to modify existing operations to resolve deviations that resulted from stack testing. The Applicant will also be able to consolidate by incorporation into consolidating by incorporation the permit Standard Permit Registration No. 81652 as part of the amendment and to correcting permit representations for existing facilities and for facilities that no longer exist at the plant site. All permit changes will reflect current operating conditions for all permitted facilities at the site. There are no proposed production rate increases for asphalt shingles, physical modifications to existing facilities, or new construction of facilities. Building Materials Corporation of America has requested to increase asphalt throughput rates for Lines 1 and 3, but the increase in asphalt throughput will not result in an increase in the production of asphalt shingles. The facilities are located at 2600 Singleton Blvd Dallas, Dallas County. Contaminants authorized under this permit include particulate matter, including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), carbon monoxide



(CO), and nitrogen oxides (NO<sub>x</sub>).

Comment [j2]: This is not a true header. I deleted all the manual headers and added automatic headers

#### Procedural Background

Before work is begun on the modification of an existing facility that may emit air contaminants, the person planning the modification must obtain a permit amendment from the commission. This permit application is amendment of Air Quality Permit Number 7711A.

The permit application was received on December 19, 2008, and declared administratively complete on January 14, 2009. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI or first public notice) for this permit application was published on February 5, 2009, in English in - the *Dallas Observer* and in Spanish in - *El Extra*. The Notice of Application and Preliminary Decision (NAPD or second public notice) for this permit application was published on March 11, 2010 in English in the *Dallas Observer*, and in Spanish in *El Extra*. Since this application was administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted in accordance with House Bill 801, 76th Legislature, 1999.

#### COMMENTS AND RESPONSES

**COMMENT 1:** Commenter believes that air emissions from the plant may be causing, or have already caused, health-related illnesses that may be linked to cancer and other diseases. (David Hunter)

**RESPONSE 1:** Section 382.002 of the TCAA authorizes the commission to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare and physical property including aesthetic enjoyment of air resources by the public and maintenance of adequate visibility. The commission does not regulate on-site worker health, but rather ambient (off-property) air. Criteria pollutants are those pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established. The U.S. EPA, under authority in the Federal Clean Air Act (FCAA), established NAAQS as levels of air quality to protect public health and welfare. The plant will continue to emit particulate matter (PM), including PM<sub>10</sub> and PM<sub>2.5</sub>, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides as the criteria pollutants. The NAAQS is set by the U.S. EPA to protect sensitive members of the population, such as children and the elderly, after scientific review and public input. Every permit holder must comply with federal and state standards established for these pollutants to ensure the protectiveness of public health and welfare. The TCAA requires that the applicant demonstrate use of best available control technology (BACT) and that the emissions are not detrimental to public health and welfare. In the review of this application, the proposed emission changes were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health

impacts from emissions of PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides. The Applicant will continue to use abatement devices and methods that meet, and in some cases exceed, BACT criteria for asphalt processing and asphalt roofing facilities with consideration given to economic reasonableness and technical practicality. All sources of emissions will vent emissions to an incinerator that will capture and destroy PM/PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and hazardous air pollutants with greater than 95 percent efficiency. A review of the RACT, BACT, LAER Clearinghouse (RBLCL), a database of nationwide permitted facilities and their associated permitted emission limits and methods of abatement, resulted in no other existing stationary source employing abatement devices or methods for control of SO<sub>2</sub>, only for abatement of PM/PM<sub>10</sub>, CO, and VOC. Evaluation of the proposed emission limit of CO resulted in the Applicant's proposed limit residing within the range of recently reviewed and approved permit limits for combustion sources also emitting CO. It is expected that the majority of emitted CO will emanate from the incinerator.

Effects Screening Levels (ESLs) are constituent-specific guideline concentrations used in the Executive Director's effects evaluation of constituent concentrations in air. These guidelines are derived by TCEQ's Toxicology Section and are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetation effects, or materials damage (e.g. corrosion). Health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. ESLs are established considering a generous safety factor to protect not only the general public, but also sensitive members of the general public. In the review of this application, the proposed health effects of asphalt vapors were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emissions of asphalt vapors.

Permit applications for new construction or modifications may be required to include air dispersion modeling in order for the TCEQ staff to evaluate the impact of emissions from the proposed facility upon the health, general welfare, and property of the public and for the Applicant to demonstrate compliance with all air quality rules and regulations and the intent of the TCAA. In this case, refined atmospheric dispersion modeling submitted in support of this application demonstrated that no cumulative concentration of any air contaminant will exceed NAAQS established for criteria pollutants or ESLs established for non-criteria pollutants. Appropriate background concentrations for criteria pollutants were retrieved from monitoring stations nearby the plant site to determine total concentrations for comparison against the NAAQS. Toxicology review of the non-criteria pollutant was unnecessary because the total concentration was less than the ESL.

For the facilities and operating procedure defined in the application, the 24-hour  $PM_{10}$  *de minimus* level is  $5 \mu\text{g}/\text{m}^3$ , and the modeled maximum ground level concentration ( $GLC_{\text{max}}$ ) value was found to be  $68 \mu\text{g}/\text{m}^3$ . Upon identifying this exceedance, The Air Quality Modeling Guidelines requires the addition of the appropriate background,  $56 \mu\text{g}/\text{m}^3$  in this case, to the modeled concentration, i.e.  $68 \mu\text{g}/\text{m}^3$ , resulting in a  $PM_{10}$   $GLC_{\text{max}}$  concentration value of  $124 \mu\text{g}/\text{m}^3$  which is significantly below the NAAQS protectiveness limit of  $150 \mu\text{g}/\text{m}^3$ .

The annual  $PM_{10}$  *de minimus* level is  $1 \mu\text{g}/\text{m}^3$ , and the modeled value at the  $GLC_{\text{max}}$  location was found to be  $18 \mu\text{g}/\text{m}^3$ . As before, upon identifying this exceedance, The Air Quality Modeling Guidelines requires the addition of the appropriate background,  $30 \mu\text{g}/\text{m}^3$  in this case, to the modeled concentration, i.e.  $18 \mu\text{g}/\text{m}^3$ , resulting in a 24-hour  $GLC_{\text{max}}$  value of  $48 \mu\text{g}/\text{m}^3$ . This, again, is lower than the NAAQS protectiveness requirement of  $50 \mu\text{g}/\text{m}^3$ .

The 1-hour  $NO_2$  *de minimus* concentration is  $10 \mu\text{g}/\text{m}^3$ , and the modeled value at the  $GLC_{\text{max}}$  location was found to be  $83 \mu\text{g}/\text{m}^3$ . Thus, as before, due to the exceedance above the *de minimus* threshold, the modeled value at the  $GLC_{\text{max}}$  location was added to the appropriate background concentration of  $103 \mu\text{g}/\text{m}^3$  resulting in a maximum concentration of  $186 \mu\text{g}/\text{m}^3$ . This value is also below the NAAQS limitation of  $188 \mu\text{g}/\text{m}^3$  required for protectiveness with respect to the NAAQS.

The annual  $NO_2$  *de minimus* concentration is  $1 \mu\text{g}/\text{m}^3$ , and the modeled value at the  $GLC_{\text{max}}$  location was found to be  $14 \mu\text{g}/\text{m}^3$ . Thus, as before, due to the exceedance above the *de minimus* threshold, the modeled value at the  $GLC_{\text{max}}$  location was added to the appropriate background concentration of  $30 \mu\text{g}/\text{m}^3$  resulting in a maximum concentration of  $44 \mu\text{g}/\text{m}^3$ . This value is also below the NAAQS limitation of  $100 \mu\text{g}/\text{m}^3$  required for protectiveness with respect to the NAAQS.

To address the state property line standard for  $SO_2$ , the modeled 1-hour concentration was used as a surrogate for comparison against the 30-minute standard. Since there is no *de minimus* value, the  $GLC_{\text{max}}$  modeled value of  $676 \mu\text{g}/\text{m}^3$  was compared directly against the TCEQ standard of  $1.021 \mu\text{g}/\text{m}^3$ . Therefore, this modeled value is lower than the TCEQ protectiveness requirement of  $1.021 \mu\text{g}/\text{m}^3$ .

The 3-hour  $SO_2$  *de minimus* concentration is  $25 \mu\text{g}/\text{m}^3$ , and the modeled value at the  $GLC_{\text{max}}$  location was found to be  $532 \mu\text{g}/\text{m}^3$ . Thus, as before, due to the exceedance above the *de minimus* threshold, the modeled value at the  $GLC_{\text{max}}$  location was added to the appropriate background concentration of  $24 \mu\text{g}/\text{m}^3$  resulting in a maximum concentration of  $556 \mu\text{g}/\text{m}^3$ . This value is also below the NAAQS limitation of  $1,300 \mu\text{g}/\text{m}^3$  required for protectiveness with respect to the NAAQS.

The 24-hour  $\text{SO}_2$  *de minimus* concentration is  $5 \mu\text{g}/\text{m}^3$ , and the modeled value at the  $\text{GLC}_{\text{max}}$  location was found to be  $329 \mu\text{g}/\text{m}^3$ . ~~Thus, as before, due to the exceedence above the~~ *de minimus* threshold, the modeled value at the  $\text{GLC}_{\text{max}}$  location was added to the appropriate background concentration of  $13 \mu\text{g}/\text{m}^3$  resulting in a maximum concentration of  $342 \mu\text{g}/\text{m}^3$ . This value is also below the NAAQS limitation of  $365 \mu\text{g}/\text{m}^3$  required for protectiveness with respect to the NAAQS.

The annual  $\text{SO}_2$  *de minimus* concentration is  $1 \mu\text{g}/\text{m}^3$ , and the modeled value at the  $\text{GLC}_{\text{max}}$  location was found to be  $39 \mu\text{g}/\text{m}^3$ . ~~Thus, as before, due to the exceedence above the~~ *de minimus* threshold, the modeled value at the  $\text{GLC}_{\text{max}}$  location was added to the appropriate background concentration of  $3 \mu\text{g}/\text{m}^3$  resulting in a maximum concentration of  $42 \mu\text{g}/\text{m}^3$ . This value is also below the NAAQS limitation of  $80 \mu\text{g}/\text{m}^3$  required for protectiveness with respect to the NAAQS.

Asphalt vapors from the facilities and operating procedure were evaluated on a short-term and a long-term basis for comparison to the ESL. On a 1-hour basis, the modeled value at the  $\text{GLC}_{\text{max}}$  location was found to be  $336 \mu\text{g}/\text{m}^3$ . This value is below the TCEQ Toxicology Section's established limitation of  $350 \mu\text{g}/\text{m}^3$  required for protectiveness with respect to the protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility. On an annual basis, the modeled value at the  $\text{GLC}_{\text{max}}$  location was found to be  $25 \mu\text{g}/\text{m}^3$ . This value is below the TCEQ Toxicology Section's established limitation of  $35 \mu\text{g}/\text{m}^3$  required for protectiveness with respect to the protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility.

All other contaminants were evaluated to be below the respective *de minimis* levels corresponding to the contaminant and the time averaging period required by the NAAQS to determine protectiveness.

In addition to meeting the above federal and state standards and guidelines, applicants must comply with 30 TAC § 101.4, which prohibits nuisance conditions. Specifically, that rule states that "no person shall discharge from any source" air contaminants which are or may "tend to be injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facilities at the plant are operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the plant is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible

Executive Director's Response to Public Comments  
Building Materials Corporation of America, Permit No. 7711A  
Page 6 of 6

Executive Director's Response to Public Comments  
Building Materials Corporation of America, Permit No. 7711A  
Page 6 of 6

enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. The TCEQ has procedures in place for accepting environmental complaints from the general public but now has a new tool for bringing potential environmental problems to light. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law and the information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us) (under Publications, search for document no. 278).

#### CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director  
Environmental Law Division

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Erin Selvera, Staff Attorney  
Environmental Law Division  
State Bar Number  
PO Box 13087, MC 173  
Austin, Texas 78711-3087  
(512) 239-6033

Representing the  
Executive Director of the  
Texas Commission on  
Environmental Quality

**Javier Galvan - BMC/Zumwalt**

---

**From:** Mike Gould  
**To:** Howell, Stephanie  
**Date:** 8/3/2010 12:06 PM  
**Subject:** BMC/Zumwalt  
**CC:** Berksan, Alex; Galvan, Javier

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Stephanie:

Building Materials is going to prehearing on August 16th and ELD is preparing the backup materials for the Judge. Erin would like to get the RTC filed as soon as possible to provide to the judge as well. Any help you can provide in getting the recent revisions that were sent to upper management approved; and then giving the authorization to file would be appreciated.

FYI -

Zumwalt RTC - Alex is continuing to incorporate your inputs and comments into the RTC. It will take him a few days to do this. Even so, it is apparent we will not be issuing the RTC with the permit on August 11th. This is ok as stated in the permit language that the RTC can be issued "... as soon as practicable after the executive director grants or denies the application." My concern is due to the public sensitivity of this project it may be perceived an issued registration did not consider public comments nor respond to them prior to issuance. We will make it a point to explain in the C-19 that an RTC will follow the issued permit; and the public's comments were considered in the ED's decision to issue the permit (if that is in fact the decision). Mike

**Javier Galvan - Re: BMC**

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**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 8/3/2010 10:52 AM  
**Subject:** Re: BMC

---

Thanks for sending the docs. I'll send what we have now and we can file the RTC later. Let your management know that we need to get this one through fairly quick since the preliminary hearing is 2 weeks away. That being said, I'll be out this afternoon and all of Thursday and Friday. I'll be here all day tomorrow but have a couple meetings. I'm hoping we can get your management's feedback by Monday at the latest so I can file it and forward it on to the Chief Clerk.

>>> Javier Galvan 8/3/2010 10:13 AM >>>  
Erin,

I have attached a copy of the draft permit that is ready for issuance, a copy of the technical review that is ready, a copy of the compliance history report, and a copy of the modeling report. There are no PDS or health effects review (they were not needed).

I have incorporated your comments into the RTC and forwarded it to APD upper management for review and approval. As of this time, we are still waiting on APD upper management for approval of the revised RTC (w/ your comments incorporated) before I can send you the revised version. As soon as I receive it, I will forward it to you and make any changes that are necessary after you review it. Thanks.

Javier

>>> Erin Selvera 8/3/2010 9:19 AM >>>  
Javier,

I need to file the documents that make up the administrative record with the Chief Clerk today. The list of documents include the following:

- Final Draft Permit, including any special provisions or conditions and MAERT
- The summary of the technical review of the permit application and Preliminary Determination Summary
- The compliance history report
- Modeling Audit Report
- Health effects review

I have copies from January but I want to make sure that I have the final versions of each of these documents so please send me the final versions. Also, we need to get the RTC filed as soon as possible so that can be sent to the judge as well.

Thanks,  
Erin

Erin René Selvera  
Attorney, Environmental Law Division

**Javier Galvan - Re: BMC**

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**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 8/3/2010 10:13 AM  
**Subject:** Re: BMC  
**CC:** Gould, Mike  
**Attachments:** CND - Building Materials Corporation of America (7711A) (amend); MRT - Building Materials Corporation of America (7711A) (amend); TRV - Building Materials Corporation of America (7711A) (amend); BMC - Permit No. 7711A\_Compliance History Report.pdf; Modeling Audit - 7711A - Building Materials Corporation of America

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Thanks,  
Erin

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
Phone 512-239-6033



**Javier Galvan - BMC**

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 8/3/2010 9:19 AM  
**Subject:** BMC

---

Javier,

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Thanks,  
Erin

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
Phone 512-239-6033  
Fax 512-239-0606

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 Please consider the environment before printing this e-mail

**Javier Galvan - RTC for BMC - Permit No. 7711A**

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**From:** Javier Galvan  
**To:** Sadler, Jayme; Wilson, Mike  
**Date:** 7/29/2010 10:45 AM  
**Subject:** RTC for BMC - Permit No. 7711A  
**CC:** Gould, Mike; Howell, Stephanie  
**Attachments:** RTC with comments from ELD\_ver 1.doc; RTC\_143272.doc

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Mike and Jayme,

I have attached the RTC with comments from the staff attorney for the amendment application for Permit No. 7711A, Building Materials Corporation of America, located in Dallas, Dallas County.

I have also attached my revised RTC with the staff attorney's comments incorporated into it. Thank you.

Javier

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 7/28/2010 4:18 PM  
**Subject:** Re: BMC RTC  
**Attachments:** 395376 Draft as of 7-28-2010.doc

oops - sorry. see attached

>>> Javier Galvan 7/28/2010 4:16 PM >>>  
Erin,

I did not receive the attachment.

>>> Erin Selvera 7/28/2010 4:00 PM >>>

Javier,

Attached is the RTC with my comments. Take a look and forward the other documents and we'll try to wrap this one up in short order.

thanks,

Erin

send to Wilson &  
Saydler  
copy Howell & Gould

**TCEQ AIR QUALITY PERMIT NUMBER 7711A**

<b>APPLICATION BY</b>	<b>§</b>	<b>BEFORE THE</b>
<b>BUILDING MATERIALS</b>	<b>§</b>	
<b>CORPORATION OF AMERICA</b>	<b>§</b>	<b>TEXAS COMMISSION ON</b>
<b>ASPHALT ROOFING PRODUCTION</b>	<b>§</b>	
<b>FACILITY</b>	<b>§</b>	<b>ENVIRONMENTAL QUALITY</b>
<b>DALLAS, DALLAS COUNTY</b>	<b>§</b>	

**EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT**

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from the following persons: David Hunter. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Office of Public Assistance at 1-800-687-4040. General information about the TCEQ can be found at our website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us).

**BACKGROUND**

Description of Facilities

Building Materials Corporation of America (BMC) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), §382.0518. This will authorize the modification of an existing facility that may emit air contaminants.

This permit will authorize the applicant to modify existing operations to resolve deviations that resulted from stack testing. There are no proposed production rate increases, physical modifications to existing facilities, or new construction of facilities. Building Materials Corporation of America has requested to increase asphalt throughput rates for Lines 1 and 3. The facilities are located at 2600 Singleton Blvd Dallas, Dallas County. Contaminants authorized under this permit include particulate matter, including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter (PM/PM<sub>10</sub>/PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NO<sub>x</sub>).

**Comment [e1]:** We need to add sentences about the other activities occurring in this application i.e. the roll in of standard permit 81652 and correction permit and MAERT to reflect current operating conditions.

**Comment [e2]:** How is this different than production rate increases – could be confusing to reader

#### Procedural Background

Before work is begun on the modification of an existing facility that may emit air contaminants, the person planning the modification must obtain a permit amendment from the commission. This permit application is for a permit amendment of Air Quality Permit Number 7711A.

The permit application was received on December 19, 2008, and declared administratively complete on January 14, 2009. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI or first public notice) for this permit application was published on February 5, 2009, in English in the *Dallas Observer* and in Spanish in *-El Extra-Spanish Newspaper*. The Notice of Application and Preliminary Decision (NAPD or second public notice) for this permit application was published in on March 11, 2010 in English in the *Dallas Observer*, and in Spanish in *El Extra*. Since this application was administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted in accordance with House Bill 801, 76th Legislature, 1999.

#### **COMMENTS AND RESPONSES**

**COMMENT 1:** Commenter believes that air emissions from the plant may be causing, or have already caused, health-related illnesses that may be linked to cancer and other diseases. (David Hunter)

**RESPONSE 1:** Section 382.002 of the TCAA authorizes the commission to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare and physical property including aesthetic enjoyment of air resources by the public and maintenance of adequate visibility. The commission does not regulate on-site worker health, but rather ambient (off-property) air. Criteria pollutants are those pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established. The U.S. EPA, under authority in the Federal Clean Air Act (FCAA), established NAAQS as levels of air quality to protect public health and welfare. The plant will continue to emit particulate matter (PM), including PM<sub>10</sub> and PM<sub>2.5</sub>, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides as the criteria pollutants. The NAAQS is set by the U.S. EPA to protect sensitive members of the population, such as children and the elderly, after scientific review and public input. Every permit holder must comply with federal and state standards established for these pollutants to ensure the protectiveness of public health and welfare. The TCAA requires that the applicant demonstrate use of best available control technology (BACT) be used at the plant and that the emissions are not detrimental to public health and welfare. In the review of this application, the proposed emission changes were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that

there will be adverse health impacts from emissions of PM, including PM<sub>10</sub> and PM<sub>2.5</sub>, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides are expected.

Effects Screening Levels (ESLs) are constituent-specific guideline concentrations used in the Executive Director's effects evaluation of constituent concentrations in air. These guidelines are derived by TCEQ's Toxicology Section and are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetation effects, or materials damage (e.g. corrosion). Health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. ESLs are established considering a generous safety factor to protect not only the general public, but also sensitive members of the general public. In the review of this application, the proposed health effects of asphalt vapors were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emissions of asphalt vapors.

In addition to meeting the above federal and state standards and guidelines, applicants must comply with 30 TAC § 101.4, which prohibits nuisance conditions. Specifically, that rule states that "no person shall discharge from any source" air contaminants which are or may "tend to be injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facilities at the plant are operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the plant is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. The TCEQ has procedures in place for accepting environmental complaints from the general public but now has a new tool for bringing potential environmental problems to light. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law and the information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have

**Comment [e3]:** We need to expand the BACT analysis and explain the results of the modeling. The old Tech review shows increases in CO and SO<sub>2</sub> but decreases in other pollutants. Please send me the current copy of your tech review, the modeling audit memo and toxicology memo so we can capture everything.

**Formatted:** Highlight

**Comment [e4]:** Did you send this one to toxicology? If so what did the memo state? Send me a copy please.

*no; toxicology review  
unnecessary since conc. <  
ESL*

Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us) (under Publications, search for document no. 278).

#### **CHANGES MADE IN RESPONSE TO COMMENT**

No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director  
Office of Legal Services

Robert Martinez, Director  
Environmental Law Division

Ms. Erin Selvera, Staff Attorney  
Environmental Law Division  
State Bar Number 24043385  
PO Box 13087, MC 173  
Austin, Texas 78711-3087  
(512) 239-6033

REPRESENTING THE  
EXECUTIVE DIRECTOR OF THE  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

**Javier Galvan - Re: BMC**

---

**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 7/28/2010 1:56 PM  
**Subject:** Re: BMC

---

Erin,

I have the following for you:

NORI - 2.5.09 (spanish)  
NAPD - 3.11.10 (spanish)

NAPD was published in the same newspaper, for both english and spanish, as NORI.

Javier

>>> Erin Selvera 7/28/2010 1:12 PM >>>

I'm looking at the RTC for BMC and need to fill a couple gaps in the procedural history regarding notice. Can you look at your file and let me know the dates of spanish publication for both NORI and NAPD and confirm that NAPD was published in the same papers as NORI. Thanks,  
Erin



**Javier Galvan - Re: BMC RTC - Permit No. 7711A**

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 7/28/2010 12:43 PM  
**Subject:** Re: BMC RTC - Permit No. 7711A

---

I looked in my files and have the RTC. I'll take a look at it and let you know if I have any questions. If not, I'll finalize any edits and send it to my supervisor for final review before filing.  
I'll be in touch.

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
Phone 512-239-6033  
Fax 512-239-0606

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>>> Javier Galvan 7/28/2010 12:24 PM >>>  
Erin,

After some more discussions with my management, it is my understanding that our division director has already reviewed and approved the RTC, and as long as you are okay with it, it is ready to be filed with the OCC. That written, based on the revisions that we performed regarding the 1-hour NO2 NAAQS, we do not need to make any corrections/revisions to the RTC. The updated modeling results did not affect, for that matter change, the special conditions or the MAERT of the permit, only my technical review associated with the review of the project. A draft RTC was sent to Booker on 5.14.10, but if you need another copy of it, please let me know, and I will send you one immediately.

Also, upper management of APD has yet to review and approve the (technical aspect of the) project, but we hope to facilitate that within the next 5 to 7 business days, i.e. we have requested our typing group to expedite the project such that I can hand-over the final technical package to upper management by next Wednesday, the latest ideally next Friday. Both Mike Gould and the section manager have reviewed and approved it (at least once).

Thanks.

Javier

>>> Erin Selvera 7/28/2010 10:36 AM >>>  
I don't need approval from anyone. We need to get the RTC out ASAP. Remind me where we are on it. Have you prepared a draft for me to review?

>>> Javier Galvan 7/28/2010 10:17 AM >>>  
Erin,

**Javier Galvan - Re: BMC RTC - Permit No. 7711A**

---

**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 7/28/2010 12:24 PM  
**Subject:** Re: BMC RTC - Permit No. 7711A

---

Erin,

After some more discussions with my management, it is my understanding that our division director has already reviewed and approved the RTC, and as long as you are okay with it, it is ready to be filed with the OCC. That written, based on the revisions that we performed regarding the 1-hour NO2 NAAQS, we do not need to make any corrections/revisions to the RTC. The updated modeling results did not affect, for that matter change, the special conditions or the MAERT of the permit, only my technical review associated with the review of the project. A draft RTC was sent to Booker on 5.14.10, but if you need another copy of it, please let me know, and I will send you one immediately.

Also, upper management of APD has yet to review and approve the (technical aspect of the) project, but we hope to facilitate that within the next 5 to 7 business days, i.e. we have requested our typing group to expedite the project such that I can hand-over the final technical package to upper management by next Wednesday, the latest ideally next Friday. Both Mike Gould and the section manager have reviewed and approved it (at least once).

Thanks.

Javier

>>> Erin Selvera 7/28/2010 10:36 AM >>>

I don't need approval from anyone. We need to get the RTC out ASAP. Remind me where we are on it. Have you prepared a draft for me to review?

>>> Javier Galvan 7/28/2010 10:17 AM >>>

Erin,

After speaking with the section manager, the following question arose:

Are you waiting on the section manager to inform you that the project is technically complete and to file the RTC, or are you waiting from approval from the section manager?

There may be some confusion over here regarding RTCs. Thank you.

Javier

Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

January 26, 2009

MR DOUG HARRIS  
PLANT ENGINEER  
GAF ELK MATERIALS CORPORATION  
2600 SINGLETON BLVD  
DALLAS TX 75212-3738

Re: Permit Alteration  
Permit Number: 7711A  
Asphalt Roofing Facility  
Dallas, Dallas County  
Regulated Entity Number: RN100788959  
Customer Reference Number: CN602717464  
Account Number: DB-0378-S

Dear Mr. Harris:

This is in response to your letter received October 24, 2008, requesting alteration of the maximum allowable emission rates table (MAERT) of the above-referenced permit. We understand that you wish to lower the emissions of volatile organic compounds (VOCs) from emission points Line 1 Cooling Section and Line 3 Cooling Section. We also understand that the testing you have performed on these emission points has shown that the emissions of VOCs are lower than those listed in your permit MAERT.

As indicated in Title 30 Texas Administrative Code § 116.116(c) [30 TAC § 116.116(c)], and based on our review, Permit Number 7711A is altered. Enclosed is the altered MAERT to replace the one currently attached to your permit. Please attach it to your permit.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC §§ 25.4 and 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following website:

[http://www.tceq.state.tx.us/compliance/compliance\\_support/qa/env\\_lab\\_accreditation.html](http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html)

Mr. Doug Harris  
Page 2  
January 26, 2009

Re: Permit Number 7711A

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at [labprgms@tceq.state.tx.us](mailto:labprgms@tceq.state.tx.us).

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Alex Berksan, P.E., at (512) 239-1595 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

Richard A. Hyde, P.E., Director  
Air Permits Division  
Office of Permitting and Registration  
Texas Commission on Environmental Quality

RAH/AB/pg

Enclosure

cc: Mr. Christine M. Chambers, Managing Consultant, Trinity Consultants, Dallas  
Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health  
Services, Dallas  
Air Section Manager, Region 4 - Fort Worth

Project Number: 141918

# EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
STILLYARD OPERATION				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
CECO1	T-1 and T-2 Laminating Adhesive Tanks CECO Filter Vent	VOC	0.03	0.17
		PM <sub>10</sub>	0.01	0.02
HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR 5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO <sub>x</sub>	0.10	0.43
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO <sub>x</sub>	3.73	16.34
		SO <sub>2</sub>	0.02	0.09
		PM <sub>10</sub>	0.28	1.23
		CO	3.13	13.71
		VOC	0.21	0.92

AP-42 1.4  
 Fuel oil No. 6, AP-42 1.3

Permit Number 7711A  
 Page 2

# EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
8/2A	Boiler and Thermal Oxidizer Vent Controlling Tanks T-8, T-9, T-10, T-14, T-15, T-110, T-120, and Blowstills T-13 and T-26	NO <sub>x</sub> SO <sub>2</sub> PM <sub>10</sub> CO VOC	0.72 0.73 5.00 1.26 0.09	3.16 3.18 21.90 5.53 0.37

1433°F

## COMMON TO LINE 1 AND LINE 3

102 1/4 hr

34 CFL/34	Electrostatic Precipitator (for Line 1 and 3) Stack	VOC PM <sub>10</sub>	5.76 3.43	25.23 15.02
98	Rail 2 Stack	PM <sub>10</sub> VOC	4.63 0.51	4.59 0.51

## LINE NO. 1 OPERATION

1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM <sub>10</sub>	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM <sub>10</sub>	0.03	0.13
1-4	Line 1 (Surfacing Section) Dust Collector Stack No. 1	PM <sub>10</sub>	0.59	2.58
1-5	Line 1 (Surfacing Section) Dust Collector Stack No. 2	PM <sub>10</sub>	0.59	2.58
1-6	Line 1 (Surfacing Section) Dust Collector Stack No. 3	PM <sub>10</sub>	0.59	2.58

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
<del>HTR1</del>	Line 1 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.20	0.86
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
<del>HTR2</del>	Line 1 Thermal Fluid Heater Vent	NO <sub>x</sub>	0.20	0.86
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
COOL1(total 3 stks)	Line No. 1 Cooling Section Exhaust	VOC	1.65	7.23
		PM <sub>10</sub>	4.00	17.52

## LINE 3 OPERATION

25	Sand Application Baghouse Stack	PM <sub>10</sub>	3.86	16.91
26A	Stabilizer Storage Baghouse Stack	PM <sub>10</sub>	0.15	0.70
26B	Stabilizer Storage Baghouse Stack	PM <sub>10</sub>	0.29	1.26
27	Stabilizer Heater Baghouse Stack	PM <sub>10</sub>	0.09	0.40
28	Asphalt Heater Vent	NO <sub>x</sub>	0.59	2.60
		SO <sub>2</sub>	<0.01	0.02
		PM <sub>10</sub>	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
<del>30</del>	Hot Oil Heater Vent (Thermal Fluid Heater)	NO <sub>x</sub>	0.27	1.20
		SO <sub>2</sub>	<0.01	0.01
		PM <sub>10</sub>	0.02	0.10
		CO	0.23	1.00
		VOC	0.01	0.04
FUG1	Plantwide Fugitive Emissions (4)	VOC	0.43	1.88
		PM <sub>10</sub>	0.91	3.97
COOL3 (total 3 stks)	Line 3 Cooling Section (3 Exhaust) Fumes from Asphalt Coater	VOC	2.76	12.09
		PM <sub>10</sub>	6.00	26.30
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.60	2.58
		SO <sub>2</sub>	<0.01	0.02
		PM <sub>10</sub>	0.05	0.20
		CO	0.49	2.16
		VOC	0.03	0.14

(1) Emission point identification - either specific equipment designation or emission point number from a plot plan.

(2) Specific point source names. For fugitive sources, use an area name or fugitive source name.

(3) NO<sub>x</sub> - total oxides of nitrogen

SO<sub>2</sub> - sulfur dioxide

PM<sub>10</sub> - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.

CO - carbon monoxide

VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

(4) Fugitive emissions are an estimate only.

<u>PM<sub>10</sub></u>	<u>NO<sub>x</sub></u>	<u>VOC</u>	<u>CO</u>	<u>SO<sub>2</sub></u>
119.41	29.47	48.82	26.76	3.27



# EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**

\* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year

\*\* Compliance with annual emission limits is based on a rolling 12-month period.

Maximum allowable Asphalt Throughput Rate: Line 1 at 24,886 lbs/hour  
Line 3 at 41,472 lbs/hour

Maximum Allowable Production Rate (Line 1 plus Line 3): 171 tons/hour of finished shingles  
1,498,000 tons/year of finished shingles

Dated January 26, 2009

	<u>existing</u> <u>tpy</u>	<u>new tpy</u>	<u>Δ</u>
NOx	28.47	17.32	↓
VOC	48.82	47.48	↓

## Permit Alteration Source Analysis & Technical Review

Company	Building Materials Corporation Of America	Permit Number	7711A
City	Dallas	Project Number	141918
County	Dallas	Account Number	DB-0378-S
Project Type	Revision	Regulated Entity Number	RN100788959
Project Reviewer	Alex Berksan, P.E.	Customer Reference Number	CN602717464
Site Name	Asphalt Roofing Facility		

### Project Overview

Building Materials Corp. of America (BMCA) requested a revision of their maximum allowable emission rates table to reflect the results of VOC testing that they have performed.

### Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM			0.00
PM <sub>10</sub>			0.00
PM <sub>2.5</sub>			0.00
VOC	54.03	48.82	-5.21
NO <sub>x</sub>			0.00
CO			0.00
SO <sub>2</sub>			0.00
HAPs			0.00

### Review Summary

The initial determination of compliance condition of this permit required testing of Line 1 Cooling Section and Line 3 Cooling Section to demonstrate compliance with allowable emissions listed in the MAERT. BMCA has conducted these tests and the results show that VOC emissions from these 2 sources are lower than the MAERT. VOC emissions from EPNs COOL1 and COOL3 have been revised and the net result is a 5.21 ton/year decrease in emissions. Permit special conditions remain unchanged.

### Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	Yes
Company representative(s):	Christine Otto Chambers, Trinity Consultants
Contacted Via:	Email
Date of contact:	1/9/2009
Other permit(s) or permits by rule affected by this action:	No
List permit and/or PBR number(s) and actions required or taken:	NA

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date
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# EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
STILLYARD OPERATION				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
CECO1	T-1 and T-2 Laminating Adhesive Tanks CECO Filter Vent	VOC	0.03	0.17
		PM <sub>10</sub>	0.01	0.02
HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR 5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO <sub>x</sub>	0.10	0.43
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO <sub>x</sub>	3.73	16.34
		SO <sub>2</sub>	0.02	0.09
		PM <sub>10</sub>	0.28	1.23
		CO	3.13	13.71
		VOC	0.21	0.92

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
✓ 8	Boiler and Thermal Oxidizer Vent Controlling Tanks T-8, T-9, T-10, T-14, T-15, T-110, T-120, and Blowstills T-13 and T-26	NO <sub>x</sub>	0.72	3.16
		SO <sub>2</sub>	0.73	3.18
		PM <sub>10</sub>	5.00	21.90
		CO	1.26	5.53
		VOC	0.09	0.37

## COMMON TO LINE 1 AND LINE 3

✓ 34	Electrostatic Precipitator (for Line 1 and 3) Stack	VOC	5.76	25.23
		PM <sub>10</sub>	3.43	15.02
98	Rail 2 Stack	PM <sub>10</sub>	4.63	4.59
		VOC	0.51	0.51

## LINE NO. 1 OPERATION

✓ 1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM <sub>10</sub>	0.23	1.01
✓ 1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM <sub>10</sub>	0.03	0.13
✓ 1-4	Line 1 (Surfacing Section) Dust Collector Stack No. 1	PM <sub>10</sub>	0.59	2.58
✓ 1-5	Line 1 (Surfacing Section) Dust Collector Stack No. 2	PM <sub>10</sub>	0.59	2.58
✓ 1-6	Line 1 (Surfacing Section) Dust Collector Stack No. 3	PM <sub>10</sub>	0.59	2.58
HTR1	Line 1 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.20	0.86
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	<u>Emission Rates *</u>	
			lb/hr	TPY**
HTR2	Line 1 Thermal Fluid Heater Vent	NO <sub>x</sub>	0.20	0.86
		SO <sub>2</sub>	0.01	0.01
		PM <sub>10</sub>	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
✓ COOL1(total 3 stks)	Line No. 1 Cooling Section Exhaust	VOC	2.22	9.73
		PM <sub>10</sub>	4.00	17.52
<b>LINE 3 OPERATION</b>				
✓ 25	Sand Application Baghouse Stack	PM <sub>10</sub>	3.86	16.91
✓ 26A	Stabilizer Storage Baghouse Stack	PM <sub>10</sub>	0.15	0.70
✓ 26B	Stabilizer Storage Baghouse Stack	PM <sub>10</sub>	0.29	1.26
✓ 27	Stabilizer Heater Baghouse Stack	PM <sub>10</sub>	0.09	0.40
✓ 28	Asphalt Heater Vent	NO <sub>x</sub>	0.59	2.60
		SO <sub>2</sub>	<0.01	0.02
		PM <sub>10</sub>	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10
30	Hot Oil Heater Vent (Thermal Fluid Heater)	NO <sub>x</sub>	0.27	1.20
		SO <sub>2</sub>	<0.01	0.01
		PM <sub>10</sub>	0.02	0.10
		CO	0.23	1.00
		VOC	0.01	0.04
✓ FUG1	Plantwide Fugitive Emissions (4)	VOC	0.43	1.88
		PM <sub>10</sub>	0.91	3.97
✓ COOL3 (total 3 stks)	Line 3 Cooling Section (3 Exhaust) Fumes from Asphalt Coater	VOC	3.38	14.80
		PM <sub>10</sub>	6.00	26.30

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
✓ HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.60	2.58
		SO <sub>2</sub>	<0.01	0.02
		PM <sub>10</sub>	0.05	0.20
		CO	0.49	2.16
		VOC	0.03	0.14

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
- (3) NO<sub>x</sub> - total oxides of nitrogen  
 SO<sub>2</sub> - sulfur dioxide  
 PM<sub>10</sub> - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.  
 CO - carbon monoxide  
 VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Fugitive emissions are an estimate only.

\* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year

\*\* Compliance with annual emission limits is based on a rolling 12-month period.

Maximum allowable Asphalt Throughput Rate: Line 1 at 24,886 lbs/hour  
 Line 3 at 41,472 lbs/hour

Maximum Allowable Production Rate (Line 1 plus Line 3): 171 tons/hour of finished shingles  
 1,498,000 tons/year of finished shingles

Dated February 13, 2007

## Construction Permit Amendment Review Analysis & Technical Review

Company:	Building Materials Corporation Of America	Permit No.:	7711A
City:	Dallas	Record No.:	122055, 124014
County:	Dallas	Account No.:	DB-0378-S
Project Type:	CAMD, CRVN	Regulated Entity No.:	RN100788959
Project Reviewer:	Alex Berksan, PE	Customer Reference No.:	CN602717464
Facility Name:	Asphalt Roofing Materials Manufacturing Facility		

### Authorization Checklist

Will a new policy/precedent be established? (ED signature required if yes) ..... No  
Is a state or local official opposed to the permit?(ED signature required if yes) ..... No  
Is waste or tire derived fuel involved? (ED signature required if yes) ..... No  
Are waste management facilities involved?(ED signature required if yes) ..... No  
Will action on this application be posted on the Executive Director's agenda? ..... Yes  
Have any changes to the application or subsequent proposals been required to increase protection  
of public health and the environment during the review? ..... No

### Project Overview

Building Materials Corporation of America (formerly GAF Materials Corporation) requested an amendment of their permit to update the MAERT with a VOC emission rate obtained from testing on EPN 34 (Electrostatic Precipitator Stack). A subsequent alteration request was received to revise the emissions of a boiler (EPN 8), which was replaced under PBR 106.264. No comments were received during the public notice and comment period.

### Compliance History

In compliance with 30 TAC Chapter 60, a compliance history report was prepared on: ..... February 5, 2007  
Was the application received after September 1, 2002? ..... Yes  
If yes, what was the site rating? **0.6 average** Company rating? **0.3 average**  
Is the permit recommended to be denied or has the permit changed on the basis  
of compliance history or rating? ..... No

### Public Notice Information

§39.403 Public notification required? ..... Yes  
A. Date application received: April 07, 2006 Date Administrative Complete: ..... 4/25/2006  
B. Small Business source? ..... No  
§39.418 C. Date 1st Public Notice /Admin Complete/Legislators letters mailed: ..... 4/25/2006, 5/5/2006  
§39.603 D. Pollutants: **organic compounds**  
E. Date Published: **5/23/2006** in *The Dallas Morning News*  
Date Affidavits/Copies received: **6/1/2006, 7/31/2006**  
F. Bilingual notice required? **Yes**  
Language: **Spanish**  
Date Published: **5/23/2006** in *Al Día*  
Date Affidavits/Copies received: **6/1/2006, 7/31/2006**  
§39.604 G. Certification of Sign Posting / Application availability **Recd 6/1/2006**  
H. Public Comments Received? **No**  
§39.419 2nd Public Notification required? **No**  
If no, give reason: **No hearing request received during first notice.**

### Emission Controls

§116.111(a)(2)(G) Is the facility expected to perform as represented in the application? ..... Yes  
§116.140 Permit Fee: **\$900** Fee certification provided? ..... **R638136**

### Sampling and Testing

§116.111(a)(2)(A)(I) Are the emissions expected to comply with all TCEQ air quality rules and regulations, and the intent of the Texas Clean Air Act? ..... Yes

## Review Analysis & Technical Review

Permit No. 7711A  
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Regulated Entity No. RN100788959

§116.111(a)(2)(B) Will emissions be measured? ..... **Yes**  
Method: **Sampling, record keeping.**

### Federal Program Applicability

§116.111(a)(2)(D) Compliance with applicable NSPS expected? ..... **Yes**  
**Subparts A and UU, Asphalt Processing and Asphalt Roofing Manufacture**  
§116.111(a)(2)(E) Compliance with applicable NESHAP expected? ..... **N/A**  
§116.111(a)(2)(F) Compliance with applicable MACT expected? ..... **N/A**  
§116.111(a)(2)(H) Is nonattainment review required? ..... **No**  
A. Is the site located in a nonattainment area? ..... **Yes (ozone-moderate)**  
B. Is the site a federal major source for a nonattainment pollutant? ..... **No**  
C. Is the project a federal major source for a nonattainment pollutant by itself? ..... **No**  
D. Is the project a federal major modification for a nonattainment pollutant? ..... **No**  
116.111(a)(2)(I) Is PSD applicable? ..... **No**  
A. Is the site a federal major source (100/250 tons/yr)? ..... **No**  
B. Is the project a federal major source by itself? ..... **No**  
C. Is the project a federal major modification? ..... **No**

### Mass Cap and Trade Applicability

§116.111(a)(2)(L) Is Mass Cap and Trade applicable? ..... **No**  
Did the proposed facility, group of facilities, or account obtain allowances to operate? ..... **N/A**

### Title V Applicability

§122.10(13)(A) Is the site a major source under FCAA Section 112(b)? ..... **No**  
(I). The site emits 10 tons or more of any single HAP? ..... **No**  
(ii). The site emits 25 tons or more of a combination ..... **No**  
§122.10(13)(C) Does the site emit 100 tons or more of any air pollutant? ..... **Yes (119 tpy PM<sub>10</sub>)**  
§122.10(13)(D) Is the site a nonattainment major source? ..... **Yes**

### Request for Comments

Region:	<b>4 DFW</b>	Reviewed by:	<b>Deferred to City of Dallas</b>
City:	<b>Dallas</b>	Reviewed by:	<b>Amanda Trammel 1/22/2007</b>

### Process Description

The plant manufactures asphalt shingles for the roofing industry. A dry, nonwoven fiberglass mat is fed into the roofing machine from an unwind stand. The fiberglass is carried through the coating section, where coating asphalt mixed with a stabilizer (limestone) is applied to both surfaces of the mat. The coating operation is followed by the surfacing section. Ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and itself in the finished package. The hot sheet, with a mineralized surface, then goes into the cooling section of the machine. Cooling is accomplished by passing the web over a series of water-cooled drums, through water mist sprays and between air jets. It is then accumulated in the looper section of the machine to provide surge capacity required prior to cutting. Self-seal striping dots are then applied and the sheet is cut into shingles and automatically packaged.

The boiler in question accepts the thermal oxidizer exhaust for preheating recovery and fires as necessary to meet the steam needs of the plant.

### Sources, Controls, Source Reduction and BACT [§116.111(a)(2)(C)]

VOC emissions listed for EPN 34, Electrostatic Precipitator Stack, were found to be 5.76 lb/hr, instead of the permitted 3.20 lb/hr. This ESP controls emissions from the coating portion of the process. The annual emissions were revised to 25.23 tons/yr from the permitted 14.94 tons/yr.



## Review Analysis & Technical Review

Permit No. 7711A

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Page 3

The waste heat boiler (EPN 8) was replaced under PBR 106.264 and the revised emissions are included in this amended permit. The change in emissions from EPN 8 is as follows (tons/yr):

	<u>NO<sub>x</sub></u>	<u>SO<sub>2</sub></u>	<u>PM<sub>10</sub></u>	<u>CO</u>	<u>VOC</u>
Before	7.70	3.20	21.90	5.60	0.40
After	3.16	3.18	21.90	5.53	0.37
Δ	-4.54	-0.02	0	-0.07	-0.03

Use of the ESP to control emissions from the coating operations is consistent with current BACT. The boiler does not have any controls and that also is acceptable under today's BACT.

### Impacts Evaluation

1. Was modeling done? **Yes** Type? **Screen**
2. Will GLC of any air contaminant cause violation of NAAQS? ..... **No**
3. Is this a sensitive location with respect to nuisance? ..... **Yes (David Morris, City of Dallas EHS site review)**
4. Is the site within 3000 feet of any school? ..... **No**
5. Toxics Evaluation:

The applicant's technical consultant (Christine Otto, Trinity Consultants, Dallas) followed the flowchart in the Modeling and Effects Review Applicability guidance document. Since the concentration due to the emission increase was  $\leq 0.1 \times \text{ESL}$ , no further modeling or effects review was required.

### Miscellaneous

1. Is applicant in agreement with special conditions? ..... **Yes**  
Company representative? ..... **Christine Otto, phone 2/6/2007**
2. Emission reductions from source reduction or pollution prevention ..... **None**
3. Emissions reductions resulting from the application of BACT required by state rules, avoidance of potential impacts problems, and voluntary reductions ..... **None**
4. Other permit(s) affected by this action? ..... **No**

Project Reviewer

Date

Team Leader/Section Manager/Backup

Date

## Air Permits Division (APD) New Source Review (NSR) Response to Comments Procedures

Permit reviewers are the Response to Comments (RTC) coordinator for any project that they are working which receives comments from the public. This document outlines the basic steps required in order to complete an RTC. Each RTC must be completed, approved, and filed with the Office of the Chief Clerk (OCC) within 60 days of the close of the comment period.

1. Receipt of comment letter(s) from the OCC. If permit reviewer receives a letter directly he or she needs to verify that the letter has been received by OCC as well.
  - Immediately enter all appropriate tracking element data into the NSRP IMS.
  - The data entered into the NSRP IMS is used by the Technical Programs Support Section (TPSS) to generate a monthly tracking report that is provided to the Office of Legal Services (OLS) for work-load planning purposes. This report may be found in the "Project Workload Reports" folder in Crystal Enterprise.
2. Inform team leader that a RTC will be required for the project.
  - Enter the beginning date of the 60-day RTC draft period. Enter this date at the conclusion of the comment period in the appropriate tracking element of the project's NSRP IMS record.
  - For novel, complex, or voluminous RTCs, the team leader can consult with the senior air attorney on the need to assign an attorney at an earlier stage of the process.
3. Coordinate with division staff (such as the modelers or other permit reviewers) and Toxicology Section staff as applicable to create a draft RTC.
  - Account and allow for the time that will be needed by other agency staff to respond.
  - Submit the draft RTC to the team leader for review, revision and team leader approval.
  - Coordination regarding workloads and timelines must be resolved expeditiously through team leaders and/or section managers.
4. Team leader contacts the senior air attorney to request that a staff attorney be assigned to the RTC.
  - Submit the draft RTC to the staff attorney **as soon as possible** after the close of the comment period. The RTC must be completed, approved, and filed with OCC within 60 days of the close of the comment period.
5. The staff attorney will make comments, edit the RTC, and incorporate comments from the Office of Public Assistance (OPA) as necessary. The staff attorney will then send the draft RTC back to the permit reviewer.
6. Submit the draft final package and RTC to team leader for review.
  - Submit the draft permit final package in a **red folder** with a pink APD Correspondence Routing Slip, indicating the project is a "Rush". The folder should include:

### Left side of folder:

- NSRP IMS project record
- Technical Review Summary
- PI-1/PI-1R
- Letter with company's request (if applicable)
- Other pertinent info if applicable

### Right side of folder:

- 8½ x 11 "DO NOT SIGN" notice
- Final action letter for APD Dir. signature (and one for the Commission if going to Agenda)
- Permit face (if CRVW or RNEW)
- Special Conditions
- MAER Table

- Submit the draft RTC in a **yellow folder** with a Motion to Overturn (MTO) letter from word processing. The draft RTC should never pass through APD word processing; this is a legal document and the final RTC is prepared by OLS. If the project is a Standard Permit then a C19 for the division director's signature will be in the package rather than an MTO letter. (A copy of the final Time/Date Stamped version of the RTC and comment letter(s) should be included in the yellow folder as an enclosure to the MTO or C19 letter prior to final signature of the permit package.)
7. The team leader routes the draft permit final package and draft RTC through the signature chain to the division director for approval. The division director will initial the APD Correspondence Routing Slip on the front of the red folder to indicate approval.
8. Once the draft permit final package and draft RTC have been reviewed and approved by management, the permit reviewer will send it back to the staff attorney to file with OCC. **Each RTC must be completed, approved, and filed with OCC within 60 days of the close of the comment period.**
- When the permit reviewer returns the approved, draft RTC to the staff attorney the draft RTC should be accompanied by a complete KHE package. A KHE package is the package submitted to OLS before an RTC is filed with OCC and should include the following:
    - Draft RTC
    - Copy of APD Correspondence Routing Slip (initialed by division director)
    - Permit face (if CRVW or RNEW)
    - Special Conditions
    - MAER Table
    - Technical Review Summary
    - Results of the Delinquent Fee Check
    - Toxicology Memo
    - Modeling Memo
    - Final Action Letters
    - Compliance History
9. OLS will file the RTC with OCC.
10. If there is a hearing request associated with the RTC, OLS will schedule the project for Agenda.
- A summary paragraph for the project should be drafted by the staff attorney and permit reviewer. This project summary should be submitted to the APD team leader and sent through the management chain to the APD division director as soon as an Agenda date is scheduled.
11. If the project is **not** going to Agenda, the staff attorney should return a copy of the filed RTC to the permit reviewer for final processing and signature by APD management.

**In no circumstance should an RTC be filed with OCC or a project be placed on Agenda without the approval of the division director.**

In accordance with division policy, the APD permit reviewer is responsible for the permit application and for ensuring that the permit draft and RTC are completed within agency guidelines and time-lines. Any issues that would cause the RTC process to exceed 60 days should be brought to the attention of the team leader and section manager immediately.

#### **ADDITIONAL RESOURCES**

**RTC Library at: <http://home.tceq.state.tx.us/internal/oprr/rtc/rtc.html>**

**See RTC Process Flow Diagram for maximum processing timeframes**

Location: J:\everyone\APD Technical and Permit Processing\APD Permit Guidance Documents\NSR Public Notice\APD RTC Procedures  
Maintained by: Michael Wilson  
Last update: 5/13/08

# New Source Review

## Public Notice Guidance Document for Permit Reviewers

### 2<sup>nd</sup> Notice

*(This document is maintained by Beryl Thatcher and was created on April 27, 2007.)*

**Which permit types require 2<sup>nd</sup> notice and what should be included in the 2<sup>nd</sup> notice package?**

<b>Federal Permits</b> (PSD, NA, 112g, PAL - all contested & uncontested)	Public Notice Authorization Package (PNAP)
	Briefing Sheet
	Preliminary Determination Summary (PDS)
	Draft Technical Review Summary
	Draft Special Conditions
	Draft MAERT
	Mikey

<b>State Permits</b> (all contested and/or timely hearing request received and not withdrawn)	Public Notice Authorization Package (PNAP)
	Draft Technical Review Summary
	Draft Special Conditions
	Draft MAERT
	Mikey

**When is the 2<sup>nd</sup> notice package prepared?**

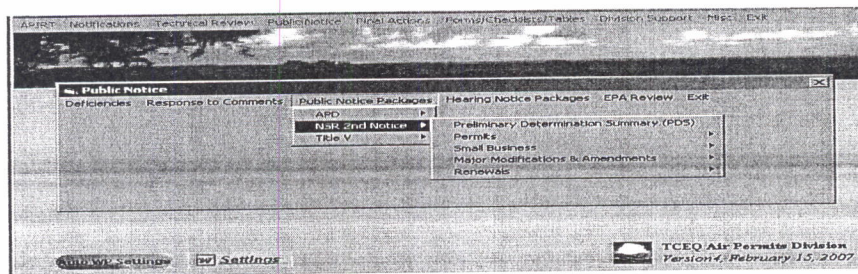
- Once the technical review of the application is complete, a draft permit has been agreed upon by everyone (us, region, company, local programs, etc.), and a staff attorney has been assigned to the project (contested cases).

**What is each of these items?**

- **2<sup>nd</sup> Notice Package:** The package includes the PNAP, a draft permit (consisting of special conditions and MAERT) and draft technical review summary. The only exception to the package is Federal Permits which also include a Preliminary Determination Summary and Briefing Sheet.
- **Public Notice Authorization Package (PNAP):** A single merge macro is run to obtain the notice authorization letter to company authorizing them to publish notice, the notice itself, and notice instructions.

- Briefing Sheet: One page summary of the project and pollutant(s) triggering federal review.
- Preliminary Determination Summary (PDS): Summary of the project and the levels for the PSD pollutant(s) triggering federal review. Includes discussion on items such as, BACT, modeling results, toxics review, and federal requirements.
- Draft Technical Review Summary: Same technical review found in NSR packages sent during final signature; however this one is a draft. The Public Notice Section is left blank for Second Notice information until all affidavits and copies of newspaper clippings have been returned to TCEQ.
- Draft Special Conditions: Special conditions formulated and agreed upon by the reviewer and applicant with a watermark of DRAFT on every page.
- Draft MAERT: MAERT, formulated and agreed upon by the reviewer and applicant, with a watermark of DRAFT on every page.

Where do I find the PNAP and PDS for my permit?



APD Menu → Public Notice → Public Notice Packages → NSR 2<sup>nd</sup> Notice → Choose appropriate PNAP for your project(s)

APD Menu → Public Notice → Public Notice Packages → NSR 2<sup>nd</sup> Notice → Preliminary Determination Summary (PDS)

## What tracking elements are associated with 2<sup>nd</sup> notices?

- Prepopulated Tracking Elements:
  - PN-2<sup>nd</sup> PUBLIC NOTICE: Beginning date is when second notice package is mailed. End date is when all affidavits, newspaper clippings, and certifications are received by the TCEQ. This tracking element is prepopulated on PRVW, PAMD, NRVW, NAMD, and 112G permits.
  - PN-CMMNT PERIOD: Comment period is at least 30 days depending on permit type.
- Tracking Elements Perhaps Relevant but not Prepopulated:
  - TR-DATE RECEIVED COMMENT: Date Comment on Draft Permit Received (*Note: Reserved for if/when comments are received from EPA*)

## What are the review procedures for 2<sup>nd</sup> notices?

- Before assembling 2<sup>nd</sup> notice package, team leader or section manager contacts senior Air attorney to assign an attorney to your permit (*contested only*).
- Permit Reviewer drafts the permit (special conditions and MAERT).
- Permit Reviewer should get names & addresses of the mayor, county judge & the Council of Government (COG) for the PNAP.
  - Mayor - [www.texasonline.com](http://www.texasonline.com) (government→ cities)*
  - County judge - [www.texasonline.com](http://www.texasonline.com) (government→ counties)*
  - COG - [www.txregionalcouncil.org/regions.php](http://www.txregionalcouncil.org/regions.php)*
- The concentrations of increment consumed for applicable pollutants and averaging periods (SO<sub>2</sub>, PM and NO<sub>2</sub>) is needed to be placed into Example A for newspaper publication.
- Permit Reviewer merges and profiles PNAP.
- Submit PNAP and draft permit to WPO.
- Permit Reviewer merges and profiles technical review.
- Permit Reviewer merges and profiles Briefing Sheet and PDS, if applicable.
- Permit Reviewer submits 2<sup>nd</sup> notice package to WPO.

- WPO will process and return profiled PNAP, draft MAERT and draft conditions in a grey folder.
- Permit Reviewer will add to the left side of the folder the technical review, Briefing Sheet and PDS (for federal permits only), and the Mikey. The right side will contain the profiled items (PNAP, draft MAERT and draft conditions).
- Permit reviewer turns 2<sup>nd</sup> notice package into Team Leader/Project Coordinator for review.
- Team Leader/Project Coordinator forwards 2<sup>nd</sup> notice package to Section Manager for review.
- 2<sup>nd</sup> Notice Package is returned to Permit Reviewer to make appropriate changes (if any).
- 2<sup>nd</sup> Notice Package is returned to WPO.
- WPO sends 2<sup>nd</sup> notice package to CCO by hard copy and email.
- Chief Clerk mails 2<sup>nd</sup> public notice package.

RECEIVED

JUL 05 2010

AIR PERMITS DIVISION

July 1, 2010

Mr. Daniel R. Jamieson  
Air Dispersion Modeling Team  
Texas Commission on Environmental Quality  
12100 Park 35 Circle, Mail Code 163  
Austin, TX 78753

Re: *NAAQS NO<sub>2</sub> 1-hour Compliance Demonstration*  
*Building Materials Corporation of America – Dallas Plant – Dallas County*  
*TCEQ Account No. DB-0378-S,*  
*TCEQ Customer Number (CN) 602717464, Regulated Entity Number (RN) 100788959*

Dear Mr. Jamieson:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the Texas Commission of Environmental Quality (TCEQ) on December 18, 2008 (hereby referred to as "2008 NSR permit amendment application"). As a part of this permit amendment application, GAF submitted an air dispersion modeling report on May 5, 2009 (hereby referred to as "2009 air dispersion modeling submittal"). On May 11, 2010, TCEQ requested an air dispersion modeling analysis to demonstrate that emissions of nitrogen dioxide (NO<sub>2</sub>) would not cause or contribute to a violation of the newly promulgated NO<sub>2</sub> 1-hour National Ambient Air Quality Standard (NAAQS).<sup>1,2</sup>

A memorandum summarizing the proposed modeling approach, which is followed in this modeling analysis, was submitted to the TCEQ via email on May 19, 2010.<sup>3</sup> The air dispersion modeling approach was discussed with the TCEQ via a conference call on May 20, 2010 with a summary of the call submitted to all attendees later that afternoon.<sup>4,5</sup> GAF conducted the NO<sub>2</sub> 1-hour NAAQS modeling analysis, based on the guidance received from the TCEQ during the conference call on May 20, 2010, and

<sup>1</sup> Per email from Mr. Javier Galvan (TCEQ) to Ms. Latha Kambham (Trinity Consultants) on May 11, 2010.

<sup>2</sup> The new NO<sub>2</sub> 1-hour NAAQS was published in the Federal Register (75 FR 6474) on February 9, 2010, and went into effect on April 12, 2010.

<sup>3</sup> Proposed modeling approach memo submitted to Mr. Daniel Jamieson (TCEQ) via email from Ms. Latha Kambham (Trinity Consultants) on May 19, 2010.

<sup>4</sup> Conference call regarding proposed NO<sub>2</sub> 1-hr modeling approach. Attendees: Mr. Daniel Jamieson and Mr. Javier Galvan (TCEQ), Mr. Doug Harris and Mr. Fred Bright (GAF), Mr. Rodman Johnson (Brown McCarroll), and Ms. Christine Chambers and Ms. Latha Kambham (Trinity Consultants).

<sup>5</sup> Approved modeling approach memo submitted to Mr. Daniel Jamieson (TCEQ) via email from Ms. Latha Kambham (Trinity Consultants) on May 20, 2010.



subsequent guidance received via emails from the TCEQ.<sup>6</sup> The modeling approach used for the analysis and the modeling results are provided in this letter.

For the NO<sub>2</sub> 1-hour NAAQS compliance demonstration, GAF used the same approach for the modeled source parameters, building wake effects, receptor grids, and meteorological data as detailed in the May 2009 air dispersion modeling report, with the following updates:

- Stack height for the following Emission Point Numbers (EPNs) were updated to 57 feet:
  - EPN 8A: Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack
  - EPN WHBLR1: Waste Heat Recovery Boiler Natural Gas Burner Side
  - EPN HTR7: Asphalt flux heater
  - EPN HTR8: Filled coating heat exchanger heater

Due to the updates to the stack heights for the above mentioned sources, the building wake effects (downwash) were re-evaluated in terms of their proximity to nearby structures.

- The most current version of the AERMOD terrain preprocessor (AERMAP version 09040) was used to update the terrain elevations for the sources, receptors, hill heights for receptors, and buildings.
- The most current version of the AERMOD model (version 09292) was used to obtain the air quality modeling results.

As noted, the modeling was otherwise conducted as per the previously submitted May 2009 report. Please refer to that report for information concerning all other modeled source parameters, building wake effects, receptor grids, and meteorological data. A revised TCEQ Table 1(a) listing the updated stack heights for the above noted EPNs is provided in Attachment 1 of this letter. The specific modeling approach that was used in the NAAQS Analysis for the NO<sub>2</sub> 1-hour modeling is provided below.

## **1. AIR QUALITY DISPERSION MODELING APPROACH**

### **1.1 SIGNIFICANCE ANALYSIS**

The Significance Analysis considers the emissions associated with only the proposed project to determine whether it will have a significant impact upon the surrounding area. As stipulated in the 2008 NSR permit amendment application, there are three sources that result in an emissions increase of nitrogen oxides (NO<sub>x</sub>). Table 1 below lists these sources and the emission rates. The emission increases were

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<sup>6</sup> Email communications between Mr. Daniel Jamieson (TCEQ) and Ms. Latha Kambham (Trinity Consultants) on May 24, 2010 and June 2, 2010.

used in the NO<sub>2</sub> (1-hour) Significance Analysis. Per the Ambient Ratio Method, the NO<sub>x</sub> emissions were multiplied by 0.75 to convert to NO<sub>2</sub> emission rates for air dispersion modeling purposes.<sup>7</sup>

**TABLE 1. EMISSION SOURCES AND NO<sub>x</sub> EMISSION RATES FOR SIGNIFICANCE ANALYSIS**

EPN	Source Description	Currently Permitted Emission Rate (lb/hr)	Proposed Allowable Emission Rate (lb/hr)	Increase in Emission Rate (lb/hr)
8	Thermal Oxidizer Exhaust Stack	0.72	1.90	1.18
8A	Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack			
WHBLR1	Waste Heat Recovery Boiler Natural Gas Burner Side	--	0.47	0.47

The air quality dispersion modeling analysis was conducted with 5 years of meteorological data. The meteorological data for Dallas County was obtained from the TCEQ's website for 1985, 1987, 1988, 1989, and 1990.<sup>8</sup> In the Significance Analysis, the highest first high (H1H) maximum modeled ground-level concentration (GLC<sub>max</sub>) of NO<sub>2</sub> was compared to the interim modeling significance level (MSL) of 10 µg/m<sup>3</sup>.<sup>9</sup> Similar to the 2009 air dispersion modeling submittal (discussed in Section 6.1.3 of the modeling report), the following source group scenarios were modeled in each of the modeling analyses presented in this letter.

**TABLE 2. SOURCE GROUP SCENARIOS**

Source Group	Source Group Description
<b>Scenario 1</b>	EPN 8A with all other EPNs <sup>1</sup>
<b>Scenario 2</b>	EPN 8 with all other EPNs <sup>1</sup>

<sup>1</sup> When EPN 8A is included in the source group, EPN 8 is excluded and vice versa. For the Significance Analysis, the only other EPN modeled was WHBLR1 as outlined in Table 1.

A zip folder containing the electronic copies of the modeling files used in the Significance Analysis is provided with this submittal. Based on the Significance Analysis modeling results, the H1H GLC<sub>max</sub> for NO<sub>2</sub> exceeds the applicable MSL. Therefore, a Full Impact Analysis was conducted as explained below.

## 1.2 FULL IMPACT ANALYSIS – SCREENING ANALYSIS

During the conference call with TCEQ on May 20, 2010, a Full Impact Analysis - Screening Analysis was discussed where the screening background concentration would be added to the results of the

<sup>7</sup> Per EPA discussions during the EPA Regional/State/Local Dispersion Modelers Workshop, Portland, OR, May 10-13, 2010.

<sup>8</sup> <http://ftp.tceq.state.tx.us/pub/OPRR/APD/AERMET/AERMETv06341/AERMETDataSetsByCounty/>

<sup>9</sup> Per the interim guidance provided by EPA during the EPA Regional/State/Local Dispersion Modelers Workshop, Portland, OR, May 10-13, 2010.

July 1, 2010

Significance Analysis and compared to 90% of the NAAQS. GAF did not pursue the use of this approach. As such, a Full Impact Analysis – Inventory modeling analysis was performed.

### 1.3 FULL IMPACT ANALYSIS – INVENTORY MODELING

As a first step in the Full Impact Analysis, the radius of impact (ROI) was determined. The largest ROI among all five modeled years was determined as 0.46 km based on the significance modeling analysis results. The current off-site inventories of maximum allowable emission rates for industrial sources were obtained from the TCEQ Point Source Data Base (PSDB) for use in the NAAQS analysis.<sup>10</sup> Per guidance from the TCEQ, the primary search option was selected for the request of the TCEQ PSDB.<sup>11</sup> For this analysis, a conservative (i.e., larger than required) area of impact (AOI) with a radius of 55 km was used in the PSDB inventory retrieval. The TCEQ PSDB inventories for NO<sub>x</sub> obtained from TCEQ are included in electronic format with this submittal. The modeling approach for the TCEQ-PSDB is consistent with the 2009 air dispersion modeling submittal (discussed in the Section 6.2 of the modeling report).

Additionally, GAF identified discrepancies between the New Source Review (NSR) authorizations and the TCEQ PSDB for “Americans Airlines Inc” and “DSI Transport Inc” emissions sources. Therefore, NSR authorizations available through TCEQ’s remote document server and the TCEQ Austin File Room were reviewed to ensure that emission rates provided in the PSDB were accurate for sources located at “Americans Airlines Inc” and “DSI Transport Inc” facilities. Upon reviewing these files, the TCEQ PSDB inventory was updated as outlined in Attachment 3.

For the Full Impact Analysis, all permitted sources at the GAF Dallas Plant that emit NO<sub>x</sub> [except EPN BLR5 (Standby Boiler)] were modeled with their potential-to-emit (PTE) emissions along with the off-property inventory sources.<sup>12</sup> The permit allowable emission rates for NO<sub>x</sub> were multiplied by 0.75 to convert to NO<sub>2</sub> emission rates for air dispersion modeling purposes, per the Ambient Ratio Method. A table summarizing the modeled source ID, description, source representation, and associated source parameters for all modeled emission sources that emit NO<sub>x</sub> at the GAF Dallas Plant is included in Attachment 2.

In the Full Impact Analysis, only those receptors with modeled impacts greater than the MSL in the Significance Analysis are modeled. The form of the new NO<sub>2</sub> 1-hour NAAQS is “the 3-year average of the 98<sup>th</sup> percentile of the annual distribution of daily maximum 1-hour concentrations”.<sup>13</sup> In the Full Impact Analysis, the highest eighth high (H8H) GLC<sub>max</sub> was obtained for each of the five modeled meteorological years. The average of the H8H GLC<sub>max</sub> was then added to the background concentration

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<sup>10</sup> PSDB retrieval was obtained via email from Mr. Robert Organ (TCEQ) to Ms. Latha Kambham (Trinity Consultants) on May 20, 2010.

<sup>11</sup> Per guidance provided by Mr. Dan Schultz (TCEQ) to Ms. Jacquie Hui (Trinity Consultants), via telephone conversation on May 20, 2010.

<sup>12</sup> EPN BLR5 is a standby boiler, authorized to operate 500 hours per year. This boiler will only be operated when the Thermal Oxidizer and the Waste Heat Boiler units are shut down. Therefore, EPN BLR5 is not included in the modeling analysis.

<sup>13</sup> *Primary National Ambient Air Quality Standards for Nitrogen Dioxide; Final Rule*, Federal Register, Volume 75, No. 26, February 9, 2010, pp 6474-6537.

July 1, 2010

(discussed in Section 1.4 of this letter) and compared to the NAAQS. If the resulting concentration is below the NAAQS, the demonstration is complete.

#### 1.4 NO<sub>2</sub> (1-HOUR) BACKGROUND CONCENTRATION

The impacts of emissions from the on-property and off-property sources are modeled in the air quality dispersion modeling analysis to demonstrate compliance with the 1-hour NO<sub>2</sub> NAAQS. Modeled ambient air concentrations only reflect the impacts from industrial emission sources. Therefore, to completely assess compliance with the NAAQS, “background” concentrations are typically added to the modeled ground-level concentrations. These background concentrations are representative of emissions from natural sources, nearby emissions sources other than the emission sources under consideration, and unidentified emission sources. The detailed methodology used in determining the NO<sub>2</sub> 1-hour background concentration was provided to the TCEQ via email on May 26, 2010.<sup>14</sup> However, for completeness of the submittal, these details are also included in this letter.

The GAF Dallas Plant is located at 2600 Singleton Blvd, Dallas, Dallas County, Texas. Currently, there are three active State and Local Air Monitoring Systems (SLAMS) monitoring stations for NO<sub>2</sub> located in the Dallas County.<sup>15</sup> A table summarizing the site ID, address, and approximate distance from the GAF Dallas Plant for each of these three monitors is provided below:

TABLE 3. SLAMS LOCATED IN THE DALLAS COUNTY

EPA Site ID	Address	Approximate Distance from GAF Dallas Plant
48-113-0069	1415 Hinton Street, Dallas -	3 miles North ✓
48-113-0075	12532 1/2 Nuestra Drive, Dallas -	10 miles Northeast
48-113-0087	3277 W. Redbird Lane, Dallas -	7 miles South

GAF used the Site ID 48-113-0069 to obtain the NO<sub>2</sub> background concentration based on the following:

- EPA Air Quality System (AQS) provides the highest 1<sup>st</sup> high (H1H), highest 2<sup>nd</sup> high (H2H), and annual NO<sub>2</sub> concentration values for 1998-2008 for the above mentioned monitoring stations. Site ID 48-113-0069 monitored the highest concentration values for H1H, H2H, and annual averaging periods for 8 of the 10 years. Furthermore, the trend in recent years (based on 2007 and 2008 year information) indicates higher monitored values for Site ID 48-113-0069, when compared with the other two monitoring stations.
- This monitor is located at the closest proximity to the GAF Dallas Plant.

Therefore, GAF used this monitor to obtain the NO<sub>2</sub> background concentration for the NO<sub>2</sub> 1-hour NAAQS Analysis.

<sup>14</sup> NO<sub>2</sub> 1-hour background concentration determination method submitted to Mr. Daniel Jamieson (TCEQ) via email from Ms. Latha Kambham (Trinity Consultants) on May 26, 2010.

<sup>15</sup> Information is obtained from EPA Air Database (URL: <http://www.epa.gov/oar/data/geosel.html>)

Mr. Jamieson – Page 6  
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Per EPA guidance, the background concentration for the NO<sub>2</sub> (1-hour) NAAQS analysis should be calculated as the 3-year average of the 8<sup>th</sup>-highest daily maximum 1-hour concentrations over three years of monitor data.<sup>16</sup> Currently, the EPA Air database does not process the NO<sub>2</sub> monitoring value based on the current form of the standard. Therefore, for determining the background concentration, the hourly NO<sub>2</sub> monitored values for EPA Site ID 48-113-0069 were obtained from the EPA AQS database for the most recent three years (2007-2009).<sup>17</sup> Under this EPA guidance, a day is classified as complete if it has at least 75% of the hourly concentrations recorded (i.e., at least 18 hours per day). A quarter is classified as complete if it has at least 75% of the sampling days with complete data (i.e., at least 67 to 69 depending on the quarter). A year is classified as complete if it has four complete quarters.<sup>18</sup> The obtained hourly values for EPA Site ID 48-113-0069 meet the above completeness criteria for all three years.

The average 98<sup>th</sup>-percentile daily maximum 1-hour concentration at the EPA monitor (Site ID: 48-113-0069) over 2007, 2008, and 2009 is 102.19 µg/m<sup>3</sup> as shown in Table 3 below. This value was used in the 1-hour NO<sub>2</sub> NAAQS compliance demonstration for the GAF Dallas Plant.

**TABLE 4. BACKGROUND CONCENTRATION SUMMARY**

Year	NO <sub>2</sub> Daily Maximum 1-hour Concentration (H8H)	
	(ppm)	(µg/m <sup>3</sup> )
2007	✓ 0.056 56 ppb	105.31 105.28
2008	✓ 0.056 56 ppb	105.31 105.28
2009	✓ 0.051 51 ppb	95.96 95.48
<b>Average</b>	<b>0.054</b> ✓	<b>102.19</b> ✓

A Microsoft (MS) Excel file [GAF Dallas Plant\_NO2 Background Concentration (052510).xlsx], which was used to calculate the background concentration at the EPA monitor (Site ID: 48-113-0069) is included in the electronic submittals. The monitored values are shown in tabs “2007 Monitored Value”, “2008 Monitored Value”, and “2009 Monitored Value” in the MS Excel file. To calculate the background concentration, the 8<sup>th</sup>-highest daily maximum 1-hour concentration was obtained [as shown in tabs “2007-H8H”, “2008-H8H”, and “2009-H8H” in the MS Excel file]. The average 8<sup>th</sup>-highest daily maximum 1-hour concentration was calculated, as provided in the “Summary” tab of this MS Excel file. This value was used as the representative background concentration in the 1-hour NO<sub>2</sub> NAAQS compliance demonstration.

<sup>16</sup> 75 Fed. Reg. 6474, “Primary National Ambient Air Quality Standards for Nitrogen Dioxide; Final Rule” (2010).

<sup>17</sup> <http://www.epa.gov/ttn/airs/airsaqs/detaildata/downloadaqsdta.htm>

<sup>18</sup> 75 Fed. Reg. at 6532.

## **2. MODELING RESULTS**

As discussed in Section 1.3 of this letter, the H8H NO<sub>2</sub> GLC<sub>max</sub> results were obtained at the significant receptors for all five modeled meteorological years. The average of H8H NO<sub>2</sub> GLC<sub>max</sub> was then added to the background concentration and then compared to the NAAQS. A summary of the NAAQS analysis results is presented in Table 5. As shown in Table 5, the total concentration (sum of average H8H GLC<sub>max</sub> and background concentration) is less than the applicable NAAQS. Therefore, the NAAQS compliance demonstration is complete.

TABLE 5. NAAQS ANALYSIS RESULTS FOR NO<sub>2</sub> (1-HOUR)

Pollutant	Averaging Period	Emission Source Group <sup>1</sup>	Emission Source Group Description	Meteorological Year	UTM Coordinate		Total Maximum Ground Level Concentration GLC <sub>MAX</sub> <sup>2</sup> (µg/m <sup>3</sup> )	Average of Maximum Ground Level Concentration Over 5 Years (µg/m <sup>3</sup> )	Background Concentration <sup>3</sup> (µg/m <sup>3</sup> )	Average Modeled Concentration + Background Concentration (µg/m <sup>3</sup> )	NAAQS (µg/m <sup>3</sup> )	Less than NAAQS?
					East (m)	North (m)						
NO <sub>2</sub>	1-hour	Scenario 1	8 with all other EPNs	1985	700,265	3,628,237	82.66 ✓	83.15 ✓	102.19 ✓	185.34 ✓ 185	188	Yes
				1987	700,265	3,628,237	85.06 ✓					
				1988	700,265	3,628,237	79.08 ✓					
				1989	700,265	3,628,237	86.17 ✓					
				1990	700,265	3,628,237	82.80 ✓					
		Scenario 2	8A with all other EPNs	1985	700,265	3,628,237	80.91 ✓	81.65 ✓		183.84 ✓ 184		Yes
				1987	700,265	3,628,237	83.21 ✓					
				1988	700,265	3,628,237	78.96 ✓					
				1989	700,265	3,628,237	84.39 ✓					
				1990	700,265	3,628,237	80.78 ✓					

<sup>1</sup> EPN BLR5 is a standby boiler, authorized to operate 500 hours per year. This boiler will only be operated when the Thermal Oxidizer and the Waste Heat Boiler units are shut down. Therefore, EPN BLR5 is not included in the modeling analysis.

<sup>2</sup> Total H8H Maximum Ground Level Concentration (GLC<sub>max</sub>) for the GAF Dallas Plant sources and TCEQ inventory sources obtained from AERMOD (version 09292) for met data years 1985, 1987, 1988, 1989, and 1990.

<sup>3</sup> Three years (2007 - 2009) average of 98<sup>th</sup> percentile of the annual distribution of daily 1-hour maximum concentration at the Dallas, Dallas County, at 1415 Hinton Street (site ID: 481130069).

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### 3. ELECTRONIC FILES

The electronic data files are provided in Attachment 4 (on a CD), which include the following:

- All AERMOD input and output files used for the NO<sub>2</sub> (1-hour) analysis
- Meteorological files
- BPIPP input and output data files
- Background concentration calculation spreadsheets
- TCEQ PSDB Retrieval for NO<sub>2</sub>

The following tables summarize the electronic files included in the CD.

**TABLE 6. AERMOD INPUT AND OUTPUT DATA FILE DESCRIPTIONS FOR THE NO<sub>2</sub> 1-HOUR MODELING ANALYSIS**

Modeling	File Name	Associated Files	File Description	Receptor Grid
Significance Analysis	NSS85-90.zip	Input Files (*.ami) Output Files (*.aml) Plot Files (*.plt)	Significance Modeling analysis for 1985, 1987, 1988, 1989, and 1990 meteorological years	Property Line, Tight, Fine, Medium, and Coarse grids, including five sensitive receptor locations
Full Impact Analysis	NNS85-90.zip	Input Files (*.ami) Output Files (*.aml) Plot Files (*.plt)	Full Impact Analysis for 1985, 1987, 1988, 1989, and 1990 meteorological years	Significance Receptors

**TABLE 7. METEOROLOGICAL DATA FILES USED FOR THE AERMOD MODELING ANALYSIS**

File Name	Description
DFWS85BM.SFC DFWS87BM.SFC DFWS88BM.SFC DFWS89BM.SFC DFWS90BM.SFC	Surface meteorological files
DFWS85BM.PFL DFWS87BM.PFL DFWS88BM.PFL DFWS89BM.PFL DFWS90BM.PFL	Upper air meteorological files



**TABLE 8. DOWNWASH FILES USED FOR THE MODELING ANALYSIS**


Input File Name		Output File Name	
Bpip input file		Bpip output file	Bpip summary file

**TABLE 9. OTHER FILES USED FOR THE AIR QUALITY DISPERSION MODELING ANALYSIS**

File Description	File Name
NO2 Background concentration calculations file	GAF Dallas Plant_NO2 Background Concentration (052610).xlsx
TCEQ PSDB Retrieval files	"TCEQ PSDB Retrieval" folder

If you have any questions regarding this submittal, please feel free to call me at (972) 661-8100 or Mr. Doug Harris of GAF at (214) 637-8909.

Sincerely,  
Trinity Consultants



Christine M. Otto Chambers  
Managing Consultant

**Attachments**

cc: Mr. Tony Walker, TCEQ Regional Office 4  
Mr. Javier Galvan, TCEQ Air Permits Division  
Mr. Daniel Menendez, TCEQ Air Dispersion Modeling Team  
Mr. David Miller, City of Dallas, Air Pollution Control Program  
Mr. Doug Harris, GAF  
Mr. Fred Bright, GAF  
Mr. David Fuelleman, GAF

**ATTACHMENT 1. REVISED TABLE 1(A)**

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**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
**Table 1(a) Emission Point Summary**

<b>Date</b>	7/1/2010	<b>Permit No.:</b>	7711A	<b>Regulated Entity No.:</b>	100788959
<b>Area Name:</b>	GAF Materials Corporation, Dallas Facility			<b>Customer Reference No.:</b>	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

<b>AIR CONTAMINANT DATA</b>					
<b>1. Emission Point</b>			<b>2. Component of Air Contaminant Name</b>	<b>3. Air Contaminant Emission Rate</b>	
<b>(A) EPN</b>	<b>(B) FIN</b>	<b>(C) NAME</b>		<b>Pounds per Hour (A)</b>	<b>TPY (B)</b>
HTR3	HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
			SO <sub>2</sub>	0.01	0.01
			PM <sub>10</sub>	0.01	0.02
			CO	0.04	0.18
			VOC	0.01	0.01
HTR4	HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
			SO <sub>2</sub>	0.01	0.01
			PM <sub>10</sub>	0.01	0.02
			CO	0.04	0.18
			VOC	0.01	0.01
HTR5	HTR5	Asphalt Heater for T-14 and T-15 coating Asphalt Storage and Coating Feed Loop	NO <sub>x</sub>	0.10	0.43
			SO <sub>2</sub>	0.01	0.01
			PM <sub>10</sub>	0.01	0.03
			CO	0.08	0.36
			VOC	0.01	0.02
BLR5	BLR5	Stand-by Boiler Vent	NO <sub>x</sub>	3.73	0.90
			SO <sub>2</sub>	0.02	<0.01
			PM <sub>10</sub>	0.28	0.07
			CO	3.13	0.75
			VOC	0.20	0.05

TCEQ-10153 [Revised 04/08] Table 1(a)

This form is for use by sources subject to air quality permit requirements and may be revised periodically. [APDG 5178 v5]

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
**Table 1(a) Emission Point Summary**

<b>Date</b>	7/1/2010	<b>Permit No.:</b>	7711A	<b>Regulated Entity No.:</b>	100788959
<b>Area Name:</b>	GAF Materials Corporation, Dallas Facility			<b>Customer Reference No.:</b>	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

<b>AIR CONTAMINANT DATA</b>					
<b>1. Emission Point</b>			<b>2. Component of Air Contaminant Name</b>	<b>3. Air Contaminant Emission Rate</b>	
<b>(A) EPN</b>	<b>(B) FIN</b>	<b>(C) NAME</b>		<b>Pounds per Hour (A)</b>	<b>TPY (B)</b>
8 8A	TO1 8A	Thermal Oxidizer Exhaust Stack	NO <sub>x</sub>	1.90	8.31
			SO <sub>2</sub>	29.35	128.55
		Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack	PM <sub>10</sub>	2.62	11.46
			CO	11.34	49.65
			VOC	0.09	0.37
WHBLR 1	WHBLR 1	Waste Heat Recovery Boiler Natural Gas Burner Side	NO <sub>x</sub>	0.47	2.06
			SO <sub>2</sub>	0.01	0.04
			PM <sub>10</sub>	0.11	0.48
			CO	1.24	5.43
			VOC	0.08	0.35
CFL	CFL	Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters) with ESP as backup	PM <sub>10</sub>	0.63	2.76
			VOC	5.76	25.23
1-1	1-1	Line 1 Stabilizer Storage and Heater Baghouse Stk	PM <sub>10</sub>	0.23	1.01
1-3	1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM <sub>10</sub>	0.03	0.13

TCEQ-10153 [Revised 04/08] Table 1(a)

This form is for use by sources subject to air quality permit requirements and may be revised periodically. [APDG 5178 v5]

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

**Table 1(a) Emission Point Summary**

<b>Date</b>	7/1/2010	<b>Permit No.:</b>	7711A	<b>Regulated Entity No.:</b>	100788959
<b>Area Name:</b>	GAF Materials Corporation, Dallas Facility			<b>Customer Reference No.:</b>	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

<b>AIR CONTAMINANT DATA</b>					
<b>1. Emission Point</b>			<b>2. Component of Air Contaminant Name</b>	<b>3. Air Contaminant Emission Rate</b>	
<b>(A) EPN</b>	<b>(B) FIN</b>	<b>(C) NAME</b>		<b>Pounds per Hour (A)</b>	<b>TPY (B)</b>
1-4	1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	PM <sub>10</sub>	0.59	2.58
1-5	1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	PM <sub>10</sub>	0.59	2.58
1-6	1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	PM <sub>10</sub>	0.59	2.58
COOL1 (total 3 stks)	COOL1 (total 3 stks)	Line 1 Cooling Section	PM <sub>10</sub>	8.52	37.30
			VOC	1.65	7.23
25	25	Sand Application Baghouse	PM <sub>10</sub>	1.50	6.57
26A	26A	Stabilizer Storage Baghouse A	PM <sub>10</sub>	0.15	0.70
26B	26B	Stabilizer Storage Baghouse B	PM <sub>10</sub>	0.29	1.26
27	27	Stabilizer Heater Baghouse	PM <sub>10</sub>	0.09	0.40
28	28	Asphalt Heater	NO <sub>x</sub>	0.59	2.60
			SO <sub>2</sub>	0.004	0.02
			PM <sub>10</sub>	0.04	0.20
			CO	0.50	2.20
			VOC	0.03	0.10
FUG1	FUG1	Plantwide Fugitive Emissions	PM <sub>10</sub>	0.91	3.97
			VOC	0.43	1.88

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
**Table 1(a) Emission Point Summary**

<b>Date</b>	7/1/2010	<b>Permit No.:</b>	7711A	<b>Regulated Entity No.:</b>	100788959
<b>Area Name:</b>	GAF Materials Corporation, Dallas Facility			<b>Customer Reference No.:</b>	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

<b>AIR CONTAMINANT DATA</b>					
<b>1. Emission Point</b>			<b>2. Component of Air Contaminant Name</b>	<b>3. Air Contaminant Emission Rate</b>	
<b>(A) EPN</b>	<b>(B) FIN</b>	<b>(C) NAME</b>		<b>Pounds per Hour (A)</b>	<b>TPY (B)</b>
COOL3 (total 3 stks)	COOL3 (total 3 stks)	Line 3 Cooling Section	PM <sub>10</sub>	6.74	29.52
			VOC	2.76	12.09
HTR6	HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.60	2.58
			SO <sub>2</sub>	0.01	0.02
			PM <sub>10</sub>	0.05	0.20
			CO	0.49	2.16
			VOC	0.03	0.14

EPN = Emission Point Number

FIN = Facility Identification Number

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

**Table 1(a) Emission Point Summary**

<b>Date</b>	7/1/2010	<b>Permit No.:</b>	7711A	<b>Regulated Entity No.:</b>	100788959
<b>Area Name:</b>	GAF Materials Corporation, Dallas Facility			<b>Customer Reference No.:</b>	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA			EMISSION POINT DISCHARGE PARAMETERS										
1. Emission Point			4. UTM Coordinates of Emission Point			5. Building Height (Feet)	6. Height Above Ground (Feet)	7. Stack Exit Data			8. Fugitives		
(A) EPN	(B) FIN	(C) NAME	Zone	East (Meters)	North (Meters)			(A) Diameter (Feet)	(B) Velocity (fps)	(C) Temperature (°F)	(A) Length (F)	(B) Width (Ft)	(C) Axis Degrees
HTR3	HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	14	700,204	3,628,338		22.04	1.00	18.00	200			
HTR4	HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	14	700,204	3,628,334		22.04	1.00	18.00	200			
HTR5	HTR5	Asphalt Heater for T-14 and T-15 coating Asphalt Storage and Coating Feed Loop	14	700,217	3,628,331		29.68	2.00	30.00	570			
BLR5	BLR5	Stand-by Boiler Vent	14	700,217	3,628,372		31.79	2.04	50.00	1000			
8	TO1	Thermal Oxidizer Exhaust Stack	14	700,217	3,628,363		36.99	2.03	182.24	1460			
8A	8A	Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack	14	700,218	3,628,365		57	3.94	48.38	583			
WHBLR 1	WHBLR 1	Waste Heat Recovery Boiler Natural Gas Burner Side	14	700,218	3,628,366		57	2.00	14.73	410			
CFL	CFL	Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters) with ESP as backup	14	700,178	3,628,333		40.77	2.40	32.14	103			
1-1	1-1	Line 1 Stabilizer Storage and Heater Baghouse Skt	14	700,151	3,628,387		44.1	0.80	92.00	96			
1-3	1-3	Line 1 Stabilizer Use Bin Baghouse Stack	14	700,157	3,628,355		43.96	0.84	92.00	200			
1-4	1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	14	700,121	3,628,341		23.53	2.21	123.00	76			
1-5	1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	14	700,125	3,628,341		23.53	2.21	92.00	76			
1-6	1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	14	700,128	3,628,341		23.53	2.21	123.00	76			
COOL1 (total 3 stks)	COOL1 (total 3 stks)	Line 1 Cooling Section	14	700,143	3,628,349		64.27	5.00	32.00	84			
25	25	Sand Application Baghouse	14	700,190	3,628,305		61.23	3.90	65.00	100			
26A	26A	Stabilizer Storage Baghouse A	14	700,214	3,628,310		73.35	0.65	59.00	Ambient			
26B	26B	Stabilizer Storage Baghouse B	14	700,221	3,628,309		73.35	0.65	59.00	Ambient			
27	27	Stabilizer Heater Baghouse	14	700,190	3,628,315		37.08	1.32	35.00	200			
28	28	Asphalt Heater	14	700,242	3,628,344		68.63	2.00	30.00	700			
FUG1	FUG1	Plantwide Fugitive Emissions	14	700,160	3,628,400		--	--	--	--	1048.56	800.52	--
COOL3 (total 3 stks)	COOL3 (total 3 stks)	Line 3 Cooling Section	14	700,180	3,628,310		73	5.00	32.00	84			
HTR6	HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	14	700,152	3,628,368		39.13	3.00	30.00	700			

EPN = Emission Point Number

FIN = Facility Identification Number

TCEQ-10153 [Revised 04/08] Table 1(a)

This form is for use by sources subject to air quality permit requirements and may be revised periodically. [APDG 5178 v5]

**ATTACHMENT 2. GAF MODELED SOURCE PARAMETERS AND EMISSIONS FOR  
THE FULL IMPACT ANALYSIS**

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GAF Modeled Source Locations and Parameters for the Full Impact Analysis

EPN	Modeled Source ID	Modeled Source Type	Modeled Source Description	UTM Coordinates		Modeled Release Height		Source Parameters Modeled Source Temperature		Modeled Source Velocity		Modeled Source Diameter		Emission Rates NOx	
				East	North									Hourly	Annual
				(m)	(m)	(ft)	(m)	(F)	(K)	(fps)	(m/s)	(ft)	(m)	(lb/hr)	(tpy)
28	28	POINT	Asphalt Heater	700,242	3,628,344	69	20.92	700	644.26	30	9.14	2.00	0.61	0.59	2.60
8	8	POINT	Thermal Oxidizer Exhaust Stack	700,217	3,628,363	37	11.27	1,460	1066.48	182	55.55	2.03	0.62	1.90	8.31
8A	8A	POINT	Thermal Oxidizer Exhaust thru Waste Heat Boiler	700,218	3,628,365	57	17.37	583	579.26	48	14.75	3.94	1.2	1.90	8.31
WHBLR 1	WHBLR 1	POINT	Waste Heat Recovery Boiler Natural Gas Burner	700,218	3,628,366	57	17.37	410	483.15	15	4.49	2.00	0.61	0.47	2.06
HTR1	HTR1	POINT	Heatec	700,144	3,628,391	17	5.29	469	515.93	21	6.33	2.00	0.61	0.37	1.62
HTR3	HTR3	POINT	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	700,204	3,628,338	22	6.72	200	366.48	18	5.49	1.00	0.3	0.05	0.22
HTR4	HTR4	POINT	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	700,204	3,628,334	22	6.72	200	366.48	18	5.49	1.00	0.3	0.05	0.22
HTR5	HTR5	POINT	Asphalt Heater for T-14 and T-15 coating Asphalt	700,217	3,628,331	30	9.05	570	572.04	30	9.14	2.00	0.61	0.10	0.43
HTR6	HTR6	POINT	Line 3 Stabilizer Thermal Fluid Heater Vent	700,152	3,628,368	39	11.93	700	644.26	30	9.14	3.00	0.91	0.60	2.58
HTR7	HTR7	POINT	Asphalt flux heater	700,238	3,628,347	57	17.37	475	519.26	13	4.06	1.50	0.46	0.46	2.00
HTR8	HTR8	POINT	Filled coating heat exchanger heater	700,199	3,628,341	57	17.37	475	519.26	13	4.06	1.50	0.46	0.46	2.00

### ATTACHMENT 3. INVENTORY SOURCE UPDATES AND SUPPORTING DOCUMENTATION

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This section outlines the changes made to the TCEQ PSDB Inventory Retrieval for the American Airlines and DSI Transport facilities as noted within Section 1.3 of this letter.

- **American Airlines Inc [AAI] (TCEQ Account No. TA2566T):** Per the TCEQ PSDB, the American Airlines sources are authorized via Permit No. 22299. However, Permit No. 22299 corresponds to "Sealed Air Corporation", not "American Airlines Inc." In addition, the hourly emission rates for four (4) emission sources noted under the AA data block in the PSDB are extremely high. The PSDB files ("*psdb\_NOX\_S\_latha1.txt*" and "*psdb\_NOX\_L\_latha2.txt*") provided by the TCEQ are provided in the electronic submittals. As can be seen from "*psdb\_NOX\_S\_latha1.txt*", the hourly emission rates for Source ID Numbers 12310, 12320, 12500, and 12520 are between one and six (1 - 6) tons per hour (tph) of NO<sub>x</sub>. The annual emission rates for these sources would only account for a few hours of operation in any single year. Based on these two items, additional research was conducted on the Sealed Air Corporation and American Airlines sources as noted below.
  - ***Sealed Air Corporation:*** Per TCEQ records available on-line and the hard copy files obtained from the TCEQ's Austin office, there is only one NO<sub>x</sub> emission source at Sealed Air Corporation (i.e. *EPN OX-1*) authorized via Permit No. 22299 and there are no registered PBRs. This source is included in the PSDB retrieval under the record for Sealed Air Corporation (Account No. TA2554D). As such, no change is proposed for this source.
  - ***American Airlines:*** Per TCEQ's records available on-line, the sources located at this American Airlines facility are authorized under Permit By Rules (PBRs) only. Therefore, in addition to the Technical Review documents available on TCEQ's Remote Server, hard copy PBR Registration documents were obtained from the TCEQ's Austin office. Using these documents, the following was noted:
    - The 4 emission sources (Source ID Numbers: 12310, 12320, 12500, and 12520) with very high hourly emission rates were not included in the hard copy files obtained from the TCEQ's Austin office.
    - Based on the summary of site-wide emissions included in the registration documents for American Airlines, the total hourly emission rates for this facility are 227.36 lb/hr, which is nearly equivalent to the total hourly emission rates from all of the emission sources listed in the PSDB for American Airlines minus the 4 significant sources (230.75 lb/hr). Copies of the PBR registration application documents that include the emission sources and the emissions summary tables showing site-wide emissions (obtained from the TCEQ's Austin's office) are provided in this attachment. The PSDB files appear incorrect, because the sources represented by the Source ID Numbers should

appear in corresponding TCEQ file documentation such as permit applications and permits.

Therefore, these 4 emission sources (Source ID Numbers 12310, 12320, 12500, and 12520) were removed from the inventory sources for American Airlines and all other sources included in the PSDB for this site were modeled with no additional changes.

- **DSI Transport Inc (TCEQ Account No. DB3234W, Permit No. 24954):** Per the TCEQ Central Registry, Permit No. 24954 is cancelled. In addition, per the permitting history for this facility, this facility is no longer in operation (Project No. 108618). Therefore, Source ID numbers 6890 and 6900 were deleted from the inventory sources. The Central Registry Query and the summary of Project No. 108618 are provided in this attachment.

**Emissions Summary Documents for American Airlines Inc.  
(TCEQ Account No. TA2566T)**





## BOILERS

As briefly mentioned in the discussion on space heaters, boilers are used at the AA maintenance facility and the terminal operations facility to supply winter-month heating for the following buildings:

- Hangar I - II [Maintenance Facility];
- Hangar III - IV [Maintenance Facility]; and
- 2W Automotive building [Terminal Operations Facility].

The location of these boilers can be seen on the plots in Attachments II.A Nos. 1, 2 and 5). As stated earlier, these boilers are operated only during winter months or approximately 2,000 hours per year.

The Hangar I - II central utility plant boilers (i.e. three 14.63 MMBtu/hr units constructed 1972) and the Hangar III - IV central utility plant boilers (i.e. three 31.3 MMBtu/hr units constructed 1991) will only fire natural gas. Fuel oil will not be used as backup. The boilers are authorized under Standard Exemption No. 7. The Hangar I - II and Hangar III - IV boilers meet the requirements of Standard Exemption No. 7 as follows:

- maximum heat input rating is less than 40.0 MMBtu/hr.

The 2.5 MMBtu/hr boiler in the 2W Automotive building meets all the requirements of the latest version of 30 TAC §106.183. Since it can fire only natural gas and the maximum heat input rating is less than 10.0 MMBtu/hr, NO<sub>x</sub> control technology is not required.

## STORAGE TANKS

The AA maintenance and terminal operations facilities have a number of storage tanks which contain a variety of liquids. The majority of these storage tanks are located within the Terminal operations facility. The liquids contained in the storage tanks are as follows:

- gasoline

**POOR QUALITY ORIGINAL**







### INCINERATORS

Emissions for each of the AA Terminal Operations Facility incinerators were quantified using emission factors from AP-42, 5th Edition, Supplement E, Section 2.1-12. The emission rate calculations were also based on the amount of waste burned per day [assumed 100 lbs], and an operating schedule of 365 days per year. Short term and annual emission calculations are presented in Appendix V.A.1 - Table 5. The emissions presented in the table represent emissions from one incinerator.

### SPACE HEATERS AND PRESSURE WASHERS

Emissions for each of the natural gas-fired heaters (i.e. ceiling heating units and the two pressure washer heaters) at both AA facilities were quantified using emission factors from AP-42, 5th Edition, Supplement E, Section 1.4. The emission rate calculations were also based on unit firing rates [MMBtu/hr], an assumed natural gas fuel heating value of 1,020 Btu/scf, and an operating schedule commensurate with heater maintenance and service requirements. Short term and annual emission calculations are presented in Appendix V.A.1 - Table 6a [Maintenance Facility] and Table 6b [Terminal Operations Facility].

### BOILERS

Emissions for each of the natural gas-fired boilers at AA Maintenance facility and the AA Terminal Operations Facility were quantified using emission factors from AP-42, 5th Edition, Supplement E, Section 1.4, Tables 1.4-1 and 1.4-2. The emission rate calculations were also based on unit firing rates [MMBtu/hr], an assumed natural gas fuel heating value of 1,020 Btu/scf, and an operating schedule commensurate with winter-month building heating requirements and maintenance/service requirements. Short term and annual emission calculations are presented in Appendix V.A.1 - Table 7a [Maintenance Facility] and Table 7b [Terminal Operations Facility].

### STORAGE TANKS

Emissions for each storage tank at both the Maintenance and Terminal Operations facilities were estimated using the emission factors from AP-42, 5th Edition, Supplement E, Section 5.2, Table 5.2-7 and USEPA Storage Tank Emissions Calculation Software, Version 4.07. The gasoline storage tank emissions were based on the emission factors taken from the AP-42









POOR QUALITY ORIGINAL

APPENDIX V.A.3 - SITE-WIDE

AMERICAN AIR  
DFW INTERNATIONAL

MAINTENANCE FACILITY

EMISSION SOURCE GROUP	Short-Term Emission Rates (lb/hr)					
	NOx	CO	VOC	NON-VOC	SO2	PM
ENGINES	192.480	41.460	15.480	0.000	15.160	13.820
HANGAR III-V FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
WELDING	0.000	0.000	0.000	0.000	0.000	0.000
PARTS WASHERS	0.000	0.000	0.030	0.000	0.000	0.000
SURFACE COATING	0.000	0.000	5.600	0.000	0.000	1.330
W/PE SOLVENT CLEANING	0.000	0.000	2.040	0.000	0.000	0.000
HANGAR III-V VEHICLE SURFACE COATING	0.000	0.000	0.430	0.010	0.000	0.000
SPACE HEATERS	0.860	0.366	0.100	0.000	0.010	0.070
BOILERS	10.510	11.250	1.490	0.000	1.030	0.080
WEST WAREHOUSE FUEL STATION No. 1	0.000	0.000	0.018	0.000	0.000	0.000
WEST WAREHOUSE FUEL STATION No. 2	0.000	0.000	0.190	0.000	0.000	0.000
STORAGE TANKS	0.190	0.000	0.190	0.000	0.000	0.000
TOTAL	207.88	53.17	25.70	0.01	16.20	15.30

TERMINAL OPERATIONS FACILITY

EMISSION SOURCE GROUP	Short-Term Emission Rates (lb/hr)					
	NOx	CO	VOC	NON-VOC	SO2	PM
ENGINES	17.590	3.770	1.410	0.000	1.380	1.260
WELDING	0.000	0.000	0.000	0.000	0.000	0.000
PARTS WASHERS	0.000	0.000	0.320	0.000	0.000	0.000
SE HOLD PAD FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
SW HOLD PAD FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
SPACE HEATERS & WASHERS	1.650	1.170	0.180	0.000	0.010	0.130
1E TRUCK MAINTENANCE VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
2W AUTOMOTIVE VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
GATE 2 VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
GENERATORS	0.054	0.182	0.054	0.000	0.046	0.128
BOILER	0.220	0.190	0.020	0.000	0.001	0.020
STORAGE TANKS	0.190	0.000	0.320	0.000	0.000	0.000
TOTAL	19.51	5.31	12.19	0.03	1.44	1.54



**POOR QUALITY ORIGINAL**

**ATTACHMENT V.A. - TABLE 5**

**AMERICAN AIRLINES, INC. - TERMINAL OPERATIONS FACILITY**  
DFW INTERNATIONAL AIRPORT



**SMALL INDUSTRIAL/COMMERCIAL MULTIPLE CHAMBER INCINERATOR EMISSION CALCULATIONS<sup>a</sup>**

EPNS: 2E-3EINC1 and 2E-3EINC2

CRITERIA POLLUTANT	AP-42 TABLE 2.1-12 EMISSION FACTORS (lb/dry ton)	WASTE FIRED (lb/day)	WASTE FIRED (ton/day)	WASTE FIRED (ton/yr)	HOURLY ACTUAL EMISSION RATE (ton/yr x 2000/2000 ADJUSTED)	ANNUAL ACTUAL EMISSION RATE (ton/ton x 168 hr/yr 2000 ADJUSTED)
PM	7.0	100	0.05	18.25	0.064	0.064
SO <sub>2</sub>	2.5	100	0.05	18.25	0.023	0.023
CO	10.0	100	0.05	18.25	0.091	0.091
TOC <sup>d</sup>	3.0	100	0.05	18.25	0.027	0.027
NO <sub>x</sub>	3.0	100	0.05	18.25	0.027	0.027

**Notes:**

- <sup>a</sup> These calculations represent emissions from one incinerator.
- <sup>b</sup> AP-42, 5<sup>th</sup> Edition, Supplement E, Table 2.1-12.
- <sup>c</sup> Annual emission estimations assume 365 days of operation.
- <sup>d</sup> Expressed as methane.



**Permitting Status Documents for DSI Transport Inc.  
(TCEQ Account No. DB3234W)**

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## Central Registry Query - Regulated Entity Information

### Regulated Entity Information

**RN Number:** RN102518396**Name:** DSI TRANSPORT INC**Primary Business:** TRUCK WASHING FACILITY**Street Address:** No street address on file.**County:** DALLAS**Nearest City:** DALLAS**State:** TX**Near ZIP Code:** 75011**Physical Location:** 3151 HALIFAX

### Affiliated Customers - Current

Your Search Returned **1** Current Affiliation Records ([View Affiliation History](#))

#### 1-1 of 1 Records

CN Number	Customer Name	Customer Role	Details
CN600404628	TRIMAC TRANSPORTATION SOUTH INC	OWNER	

### Industry Type Codes

Code	Classification	Name	Primary
4231	SIC	Terminal and Joint Terminal Maintenance Facilities for Motor Freight	Yes

### Permits, Registrations, or Other Authorizations

There are a total of **2** programs and IDs for this regulated entity. Click on a column name to change the sort order.

#### 1-2 of 2 Records

Program▲	ID Type	ID Number	ID Status
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	DB3234W	ACTIVE
AIR NEW SOURCE PERMITS	PERMIT	24954	CANCELLED

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**Air Permitting Actions for:**

account: DB3234W  
program area: NSR  
project status: ALL  
order by: proj\_id  
[Click on the Project Number to see details about that permit application.](#)

Program Area	Permit Number	Permit Type	Permit Status	Project Number	Company Name	Customer Number	Project type	TCEQ Received Date	Project Complete Date	Renewal Date	Project Status	Project Name	Regulated Entity	Physical Location	Region Name
NSR	24954	CONSTRUCT	VOID	27366	DSI TRANSPORTS INC	CN600404628	INITIAL	05/03/94	05/02/95	05/02/05	COMPLETE	TANK SEMITRAILER CLEANING FAC.	RN102518396	3151 HALIFAX	REGIO - DFW METRC
NSR	24954	CONSTRUCT	VOID	46255	DSI TRANSPORTS INC	CN600404628	STARTCONST	09/13/96	10/03/96	05/02/05	COMPLETE	TANK SEMITRAILER CLEANING FAC.	RN102518396	3151 HALIFAX	REGIO - DFW METRC
NSR	24954	CONSTRUCT	VOID	108618	DSI TRANSPORTS INC	CN600404628	VOIDPM1	06/07/04	08/02/04	05/02/05	COMPLETE	FACILITY NO LONGER IN OPERATION	RN102518396	3151 HALIFAX	REGIO - DFW METRC

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06/16/2010 -----AirPermits IMS - PROJECT RECORD -----

Company Name: **DSI TRANSPORTS INC**  
Central Registry Id : **CN600404628**

Region: **DFW METROPLEX** Account: **DB3234W** Central Registry Id: **RN102518396**  
County Name: **DALLAS** City: **DALLAS**  
Location : **3151 HALIFAX**

### PROJECT INFORMATION

Project Administrative Name: **FACILITY NO LONGER IN OPERATION**  
Project Technical Name: **FACILITY NO LONGER IN OPERATION**

Project Number: **108618** Permit Number: **24954** Std/Pbr Number:  
Project Received Date: **06/07/2004** Renewal Date: **05/02/2005** Issued Date: **08/02/2004**

Project Type: **VOIDPMT** Permit Type: **CONSTRUCTION**  
Project Status: **COMPLETE**

Assigned Staff:  
**REVIEWR1\_2: MALARCHER , LOUIS**  
Staff Group:  
**OPERATIONAL SUPPORT**

### FEE

Reference	Fee Receipt Number	Amount	Fee Receipt Date	Fee Payment Type
-----------	--------------------	--------	------------------	------------------

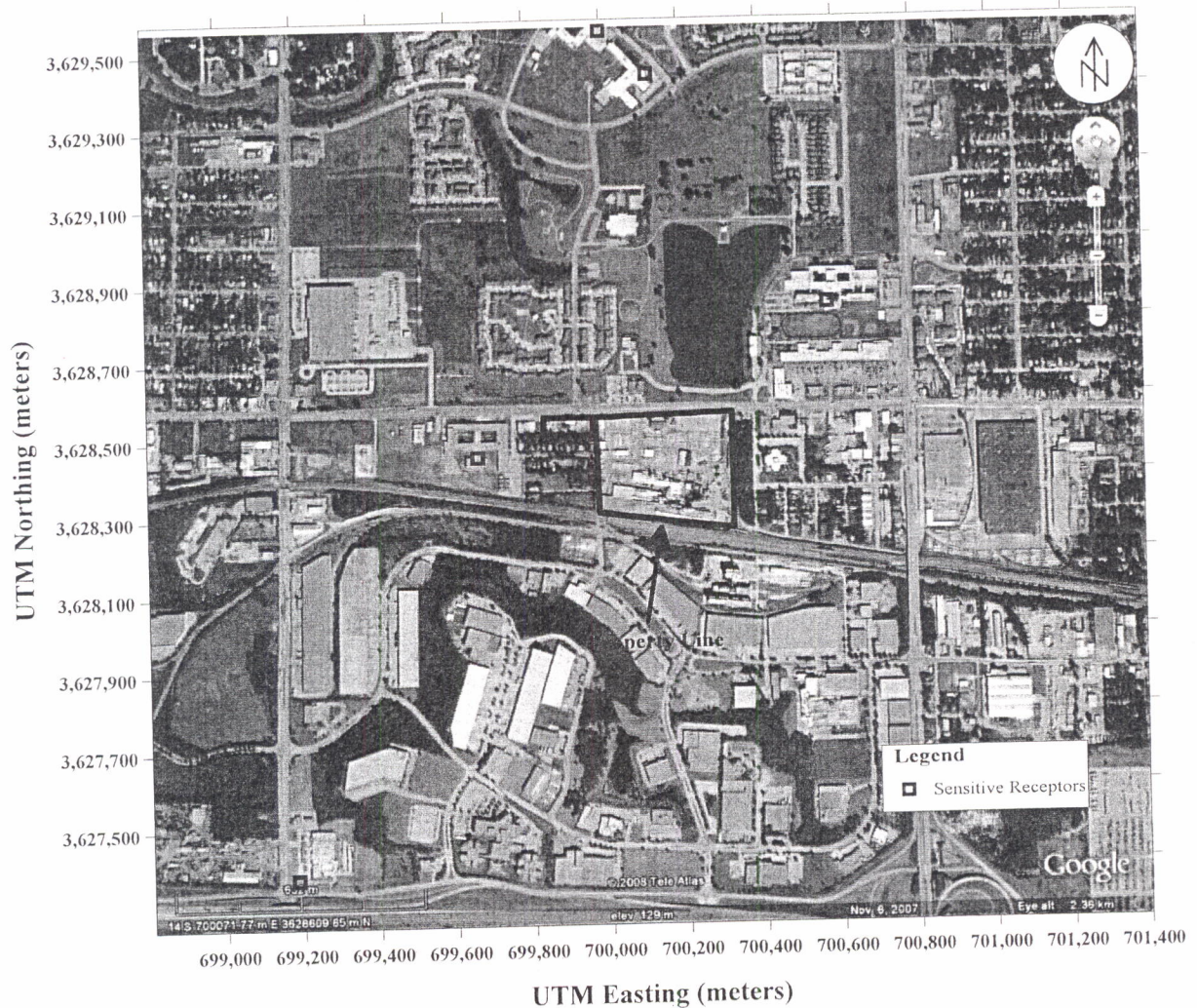
### TRACKING ELEMENTS

TE Name	Start Date	Complete Date
<b>CENTRAL REGISTRY UPDATED</b>	<b>08/02/2004</b>	
<b>APIRT RECEIVED PROJECT (DATE)</b>	<b>06/07/2004</b>	

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FIGURE 3-1. AERIAL PHOTOGRAPH OF THE GAF DALLAS PLANT



Referenced UTM Coordinates are in NAD 27 Datum.

Map Image from Google Earth Mapping Service [Version 4.3.7284.3916 (beta)], Nov. 6, 2007.  
Accessed on Nov. 12, 2008.

**FIGURE 4-1. LOCATION OF MODELED PROPERTY LINE, BUILDING STRUCTURES, AND EMISSION SOURCES FOR THE GAF DALLAS PLANT**

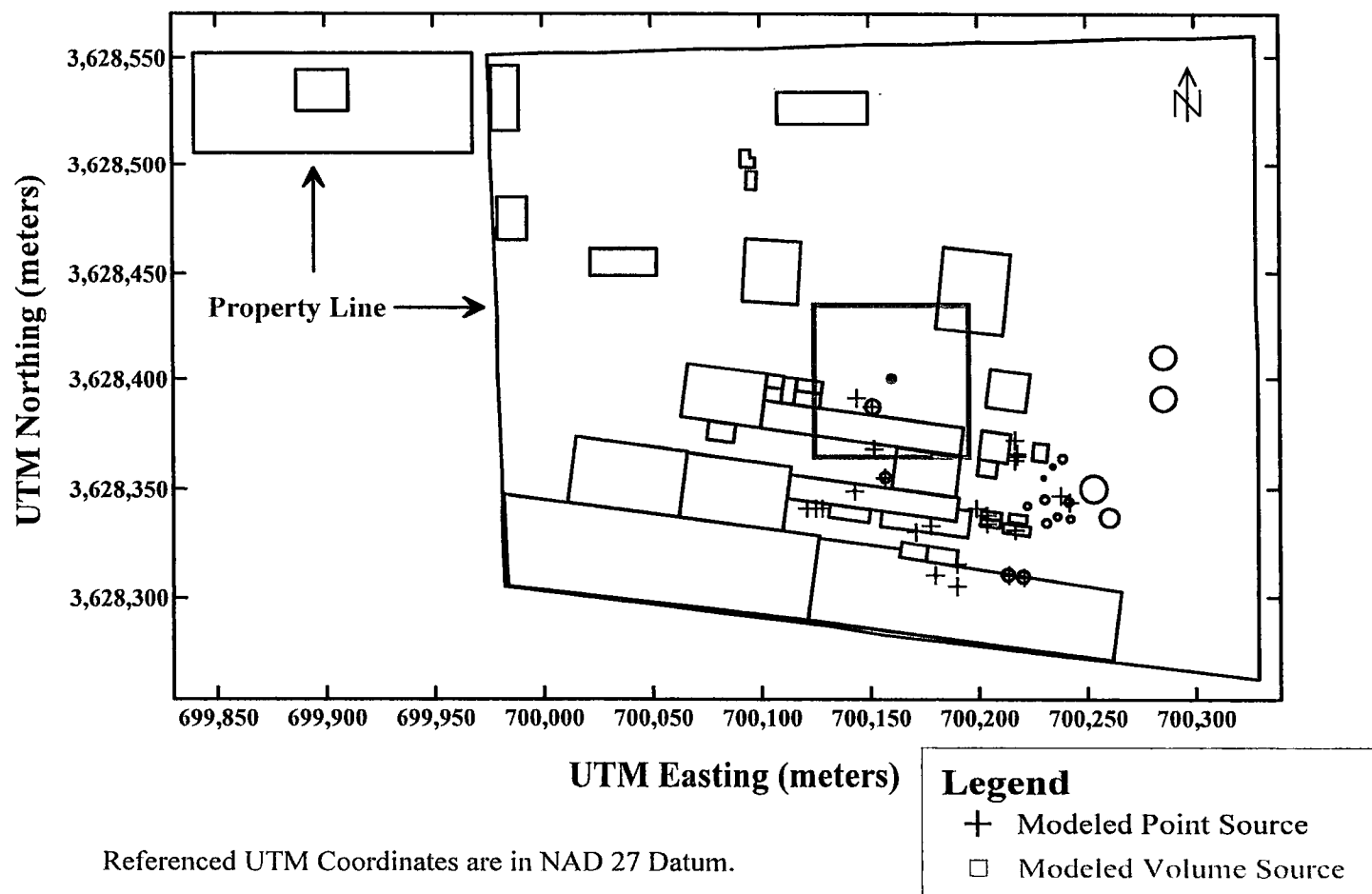
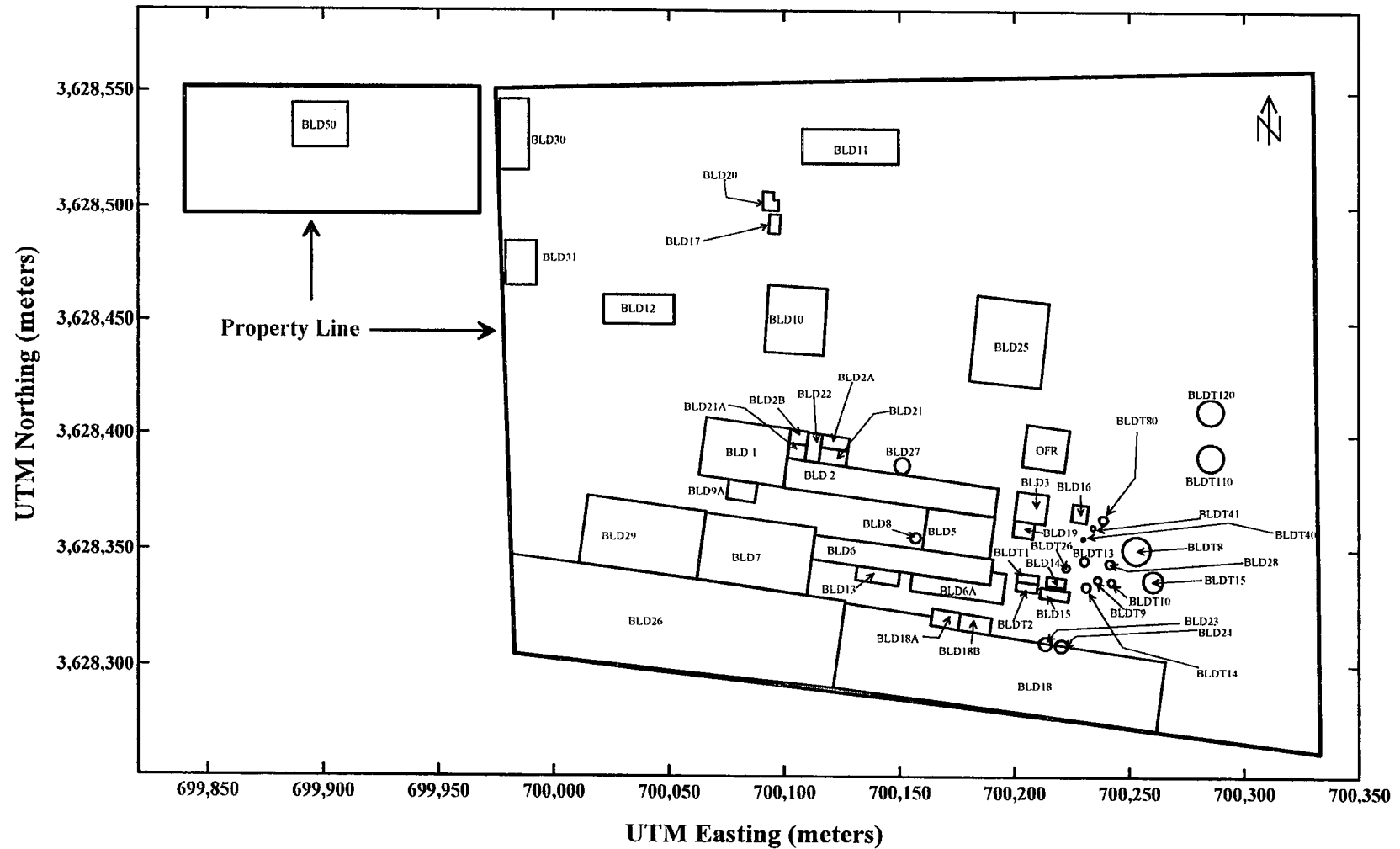


FIGURE 4-2. LOCATION AND IDS OF MODELED BUILDING STRUCTURES FOR THE GAF DALLAS PLANT



Referenced UTM Coordinates are in NAD 27 Datum.



**FIGURE 4-3. LOCATION AND EPNS OF MODELED POINT SOURCES FOR THE GAF DALLAS PLANT**

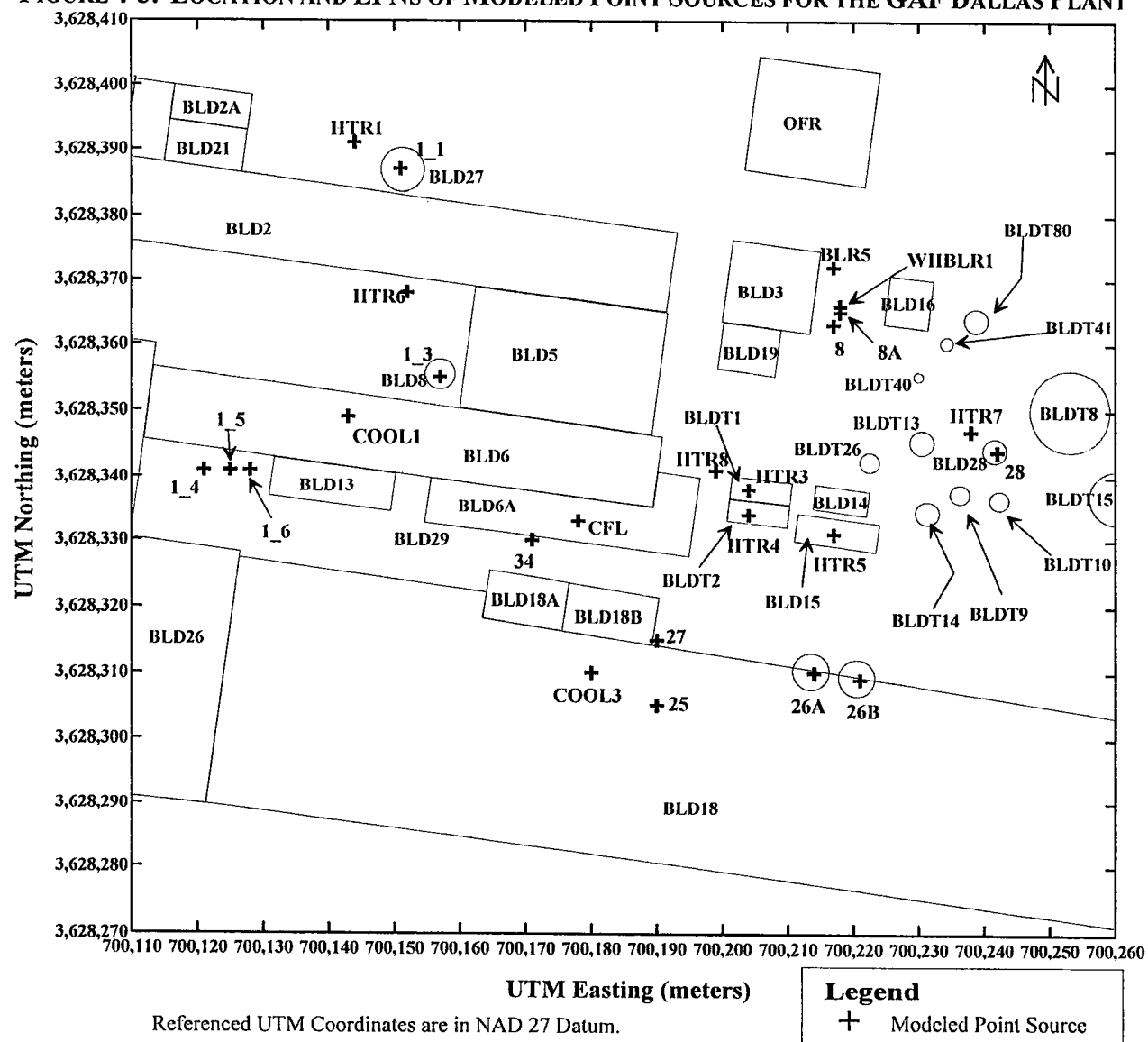


TABLE 5-1. DOWNWASH STRUCTURE HEIGHTS

Modeled Downwash Structure ID	Modeled Downwash Structure Description	Height	
		(ft)	(m)
BLD1	Building 1	21.30	6.49
BLD2	Building 2	25.06	7.64
BLD3	Building 3	25.30	7.71
BLD5	Building 5	23.00	7.01
BLD6	Building 6	27.95	8.52
BLD6A	Building 6A	28.89	8.81
BLD7	Building 7	19.60	5.97
BLD8	Line 1 Stabilizer Use Bin	39.96	12.18
BLD9A	Building 9A	14.00	4.27
BLD10	Building 10 (Employee Center)	17.46	5.32
BLD11	Building 11 (Main Office)	18.55	5.65
BLD12	Building 12	25.17	7.67
BLD13	Building 13	53.85	16.41
BLD14	Instrument Room	8.85	2.70
BLD15	Preheater Building	7.93	2.42
BLD16	Incinerator	13.18	4.02
BLD17	Credit Union	12.66	3.86
BLD18	Building 18	35.51	10.82
BLD18A	Building 18A	49.43	15.07
20 - BLD18B	Building 18B	68.04	20.74
BLD19	Stillyard Office	11.13	3.39
BLD20	Guard House	9.53	2.90
BLD21	Building 2 Tier 2	28.83	8.79
BLD22	Building 22	53.57	16.33
BLD23	Limestone Bin A	64.10	19.54
BLD24	Limestone Bin B	64.10	19.54
BLD25	Building 25	24.08	7.34
BLD26	Building 26	21.70	6.61
30 - BLD27	Line 1 Filler	42.10	12.83
BLD28	Born Heater	68.63	20.92
BLD29	New Warehouse	26.00	7.92
BLDT1	Tank T-1	13.25	4.04
BLDT2	Tank T-2	13.25	4.04

TABLE 5-1. DOWNWASH STRUCTURE HEIGHT (CONT.)

Modeled Downwash Structure ID	Modeled Downwash Structure Description	Height	
		(ft)	(m)
BLDT8 ✓	Tank T-8	27.62	8.42 ✓
BLDT9 ✓	Tank T-9	27.62	8.42 ✓
BLDT10 ✓	Tank T-10	35.53	10.83 ✓
BLDT13 ✓	Tank T-13	54.10	16.49 ✓
BLDT14 ✓	Tank T-14	60.44	18.42 ✓
BLDT15 —	Tank T-15	27.62	8.42 ✓
40 — BLDT80 —	Tank T-80 Diesel Storage Tank	24.77	7.55 ✓
BLDT26 ✓	Blowstill T-26	51.27	15.63 ✓
BLDT110 ✓	Tank T-110	32.94	10.04 ✓
WTH BLDT120 ✓	Tank T-120	32.94	10.04 ✓
OFR —	Old Fire Reservoir	14.17	4.32 —
BLD2A —	Building 2A	21.00	6.40 —
BLD2B —	Building 2B	21.50	6.55 ✓
BLD21A —	Building 21A	21.50	6.55 —
BLD30 —	Corporate Engineering Office (old)	23.47	7.15 —
BLD31 —	Old Bilbo Garage	20.87	6.36 —
BLDT40 —	Oil Knockout Tank (Stillyard)	13.49	4.11 ✓
BLDT41 ✓	Waste Oil Tank (Stillyard)	9.12	2.78 ✓
52 — BLD50 —	CARE Center	29.00	8.84 —

## Stephanie Howell - Building Materials Corp RTC

---

**From:** Stephanie Howell  
**To:** Booker Harrison  
**Date:** 5/14/2010 1:38 PM  
**Subject:** Building Materials Corp RTC  
**CC:** Galvan, Javier; Mike Gould; Selvera, Erin  
**Attachments:** HB801-RTC - Building Materials Corporation of America (7711A) (amend)

---

Booker,

Attached is the RTC for Building Materials Corp. Erin was already assigned to this project, but I don't believe she's seen the RTC yet. Steve has already reviewed and approved the RTC so when you're ok with it, it's ready to be filed with OCC.

Thanks,  
Stephanie


[http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.ProcessInfo&facility\\_id=26197&PROCESS\\_ID=104093](http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.ProcessInfo&facility_id=26197&PROCESS_ID=104093)

Last updated on Friday, May 14, 2010

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FINAL

**RBLC ID:** OH-0288  
**Corporate/Company:** OWENS CORNING  
**Facility Name:** OWENS CORNING MEDINA  
**Process:** ASPHALT BLOWING STILL/CONVERTORS (3)

### Pollutant Information - List of Pollutants

[Help](#)

Pollutant	Primary Emission Limit	Basis	Verified
Carbon Monoxide	17.6000 LB/H	BACT-PSD	UNKNOWN
Hydrocarbons, Total	95.0000 % REDUCTION	BACT-PSD	UNKNOWN
Hydrochloric Acid	5.2700 LB/H		UNKNOWN
Hydrogen Sulfide	0.1800 LB/H		UNKNOWN
Lead (Pb) / Lead Compounds	0.0011 LB/H		UNKNOWN
Nitrogen Oxides (NOx)	2.8500 LB/H		UNKNOWN
Particulate Matter (PM)	3.5700 LB/H		YES
Sulfur Dioxide (SO2)	26.9300 LB/H	BACT-PSD	UNKNOWN
Visible Emissions (VE)	0 % OPACITY		UNKNOWN
Volatile Organic Compounds (VOC)	2.0200 LB/H	BACT-PSD	UNKNOWN

**Primary Fuel:**  
**Throughput:** 18.00 T/h oxidized asphalt  
**Process Code:** 90.034

**Process Notes:** TWO UNITS (AT 17.9 T/H) CONTROLLED BY PCC THERMAL INCINERATOR AND ONE UNIT (AT 15.4 T/H) CONTROLLED BY JZ THERMAL INCINERATOR; BOTH W/ DESTRUCTION EFFICIENCY OF 95% FOR PM/PM10, H2S, CO AND VOC. ALL 3 ASPHALT BLOWING STILL/CONVERTORS COMBINED LIMITED TO 395,312 T ASPHALT/ROLLING 12-MONTHS


[http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.ProcessInfo&facility\\_id=26197&PROCESS\\_ID=104095](http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.ProcessInfo&facility_id=26197&PROCESS_ID=104095)

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## Process Information - Details

For information about the pollutants related to this process, click on the specific pollutant in the list below.

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FINAL

RBLC ID: OH-0288

Corporate/Company: OWENS CORNING

Facility Name: OWENS CORNING MEDINA

Process: GROUP 1 ASPHALT LOADING RACK #3

### Pollutant Information - List of Pollutants

[Help](#)

## Primary Fuel:

Throughput: 432000.00 GAL asphalt/D

Process Code: 90.034

Pollutant	Primary Emission Limit	Basis	Verified
Carbon Monoxide	0.2500 LB/H	BACT-PSD	UNKNOWN
Hydrocarbons, Total	95.0000 % REDUCTION		UNKNOWN
Hydrogen Sulfide	0.0300 LB/H		UNKNOWN
Particulate Matter (PM)	4.6800 LB/H		YES
Sulfur Dioxide (SO <sub>2</sub> )	0.5800 LB/H	BACT-PSD	UNKNOWN
Visible Emissions (VE)	10.0000 % OPACITY		UNKNOWN
Volatile Organic Compounds (VOC)	16.6000 LB/H	BACT-PSD	UNKNOWN

**Process Notes:** LOADING RACK RESTRICTED TO 87,500 TONS ASPHALT/ROLLING 12 MONTHS. VENTED TO REGENERATIVE THERMAL INCINERATOR OPERATED BY ELECTRICITY W/ DESTRUCTION EFFICIENCY OF 95% FOR PM/PM<sub>10</sub>, H<sub>2</sub>S, CO AND VOC. RESTRICTED TO ONLY OPERATING 2 OF 3 LOADING RACKS AT ONE TIME, OF RACKS NUMBERED #1, #2, #3.



http://cfpub.epa.gov/rblc/Index.cfm?action=PermitDetail.ProcessInfo&facility\_id=26197&PROCESS\_ID=104096  
Last updated on Friday, May 14, 2010

## Technology Transfer Network Clean Air Technology Center - RACT/BACT/LAER Clearinghouse

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[RACT/BACT/LAER Clearinghouse](#) [RBLC Basic Search](#) [RBLC Search Results](#) [Process Information - Details](#)

### Process Information - Details

For information about the pollutants related to this process, click on the specific pollutant in the list below.

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**FINAL**

**RBLC ID:** OH-0288  
**Corporate/Company:** OWENS CORNING  
**Facility Name:** OWENS CORNING MEDINA  
**Process:** GROUP 2 ASPHALT LOADING RACK #4

#### Pollutant Information - List of Pollutants

[Help](#)

#### Primary Fuel:

**Throughput:** 864000.00 GAL asphalt/D  
**Process Code:** 90.034

Pollutant	Primary Emission Limit	Basis	Verified
<u>Carbon Monoxide</u>	0.5000 LB/H	BACT-PSD	UNKNOWN
<u>Hydrogen Sulfide</u>	0.0700 LB/H		UNKNOWN
<u>Particulate Matter (PM)</u>	5.4400 LB/H		YES
<u>Sulfur Dioxide (SO2)</u>	1.1600 LB/H	BACT-PSD	UNKNOWN
<u>Visible Emissions (VE)</u>	10.0000 % OPACITY		UNKNOWN
<u>Volatile Organic Compounds (VOC)</u>	19.2900 LB/H	BACT-PSD	UNKNOWN

**Process Notes:** LOADING RACK RESTRICTED TO 275,000TONS ASPHALT/ROLLING 12 MONTHS. VENTED TO THE PCC THERMAL INCINERATOR W/ DESTRUCTION EFFICIENCY OF 95% FOR PM/PM10, H2S, CO AND VOC.



http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.ProcessInfo&facility\_id=26197&PROCESS\_ID=104091  
Last updated on Friday, May 14, 2010

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### Process Information - Details

For information about the pollutants related to this process, click on the specific pollutant in the list below.

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**FINAL**

**RBLC ID:** OH-0288  
**Corporate/Company:** OWENS CORNING  
**Facility Name:** OWENS CORNING MEDINA  
**Process:** OXIDIZED ASPHALT FIXED ROOF STORAGE TANKS (3)

#### Pollutant Information - List of Pollutants

[Help](#)

**Primary Fuel:**  
**Throughput:** 60000.00 gal tank  
**Process Code:** 90.004

Pollutant	Primary Emission Limit	Basis	Verified
<u>Carbon Monoxide</u>	0.0200 LB/H	BACT-PSD	UNKNOWN
<u>Hydrogen Sulfide</u>	0.0060 LB/H		UNKNOWN
<u>Particulate Matter (PM)</u>	0.0100 LB/H		YES
<u>Sulfur Dioxide (SO2)</u>	0.2100 LB/H	BACT-PSD	UNKNOWN
<u>Visible Emissions (VE)</u>	0 % OPACITY		UNKNOWN
<u>Volatile Organic Compounds (VOC)</u>	0.0500 LB/H	BACT-PSD	UNKNOWN

**Process Notes:** THREE OXIDIZED ASPHALT FIXED ROOF STORAGE TANKS, TWO 60,000 GALLON AND ONE 30,000 GALLON. ALL 3 TANKS VENTED TO A THERMAL INCINERATOR.





http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104094&Pollutant\_ID=1898&PermitControlEquipmentId=133228  
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## Pollutant Information

Click on the Process Information button to see more information about the process associated with this pollutant.

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FINAL

**RBLC ID:** OH-0288  
**Corporate/Company:** OWENS CORNING  
**Facility Name:** OWENS CORNING MEDINA  
**Process:** THERMAL INCINERATOR, PCC

**Pollutant:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Pollutant Group (s):** Inorganic Compounds, Oxides of Sulfur (SOx), **Substance Registry System:** Sulfur Dioxide (SO2)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:**

**Test Method:** Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:** 0  
**Compliance Verified:** Unknown

**EMISSION LIMITS:**

**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** SIP  
**Other Factors Influence Decision:** Unknown  
**Emission Limit 1:** 3.6800 LB/H  
**Emission Limit 2:** 16.1100 T/YR PER ROLLING 12-MONTHS  
**Standard Emission Limit:** 0

**COST DATA:**

**Cost Verified?** No  
**Dollar Year Used in Cost Estimates:** 2005  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Pollutant Notes:** CONTROL DEVICE.

SO<sub>2</sub> @ 247.19 tpy



http://cfpub.epa.gov/rblc/index.cfm?

action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104093&Pollutant\_ID=1898&PermitControlEquipmentID=1439898

## Technology Transfer Network

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## Pollutant Information

Click on the Process Information button to see more information about the process associated with this pollutant.

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**FINAL**

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** ASPHALT BLOWING STILL/CONVERTORS (3)

**Pollutant:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Pollutant Group (s):** InOrganic Compounds, Oxides of Sulfur (SOx),

**Substance Registry System:** [Sulfur Dioxide \(SO2\)](#)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:**

**Test Method:**

Unspecified

[EPA/QAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:**

0

**Compliance Verified:**

Unknown

**EMISSION LIMITS:**

**Case-by-Case Basis:**

BACT-PSD

**Other Applicable Requirements:**

SIP

**Other Factors Influence Decision:**

Unknown

**Emission Limit 1:**

26.9300 LB/H EACH STILL

**Emission Limit 2:**

75.5500 T/YR EACH STILL, PER ROLLING 12-MONTHS

**Standard Emission Limit:**

0

**COST DATA:**

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:**

0 \$/ton

**Incremental Cost Effectiveness:**

0 \$/ton

**Pollutant Notes:**

LIMITS ARE FOR EACH OF 17.9 TON/H UNITS. LIMIT FOR 15.4 T/H UNIT IS 23.25 LB/H AND 65.38 T/ROLLING 12-MONTHS



http://cfpub.epa.gov/rblc/index.cfm?  
action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104095&Pollutant\_ID=18988  
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## Pollutant Information

Click on the Process Information button to see more information about the process associated with this pollutant.

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FINAL

**RBLC ID:** OH-0288  
**Corporate/Company:** OWENS CORNING  
**Facility Name:** OWENS CORNING MEDINA  
**Process:** GROUP 1 ASPHALT LOADING RACK #3

**Pollutant:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Pollutant Group (s):** Inorganic Compounds, Oxides of Sulfur (SOx), **Substance Registry System:** Sulfur Dioxide (SO2)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N  
**P2/Add-on Description:**

**Test Method:** Unspecified [EPA/DAR Methods](#) [All Other Methods](#)

**Percent Efficiency:** 0  
**Compliance Verified:** Unknown

**EMISSION LIMITS:**  
**Case-by-Case Basis:** BACT-PSD  
**Other Applicable Requirements:** SIP  
**Other Factors Influence Decision:** Unknown  
**Emission Limit 1:** 0.5800 LB/H  
**Emission Limit 2:** 0.3900 T/YR PER ROLLING 12-MONTHS  
**Standard Emission Limit:** 0

**COST DATA:**  
**Cost Verified?** No  
**Dollar Year Used in Cost Estimates:** 2005  
**Cost Effectiveness:** 0 \$/ton  
**Incremental Cost Effectiveness:** 0 \$/ton  
**Pollutant Notes:**



<http://cfpub.epa.gov/rblc/index.cfm?>

[action=PermitDetail.PollutantInfo&Facility\\_ID=26197&Process\\_ID=104096&Pollutant\\_ID=1898&PermitControlEquipmentId=139288](#)

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## Pollutant Information

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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** GROUP 2 ASPHALT LOADING RACK #4

**Pollutant:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Pollutant Group (s):** Inorganic Compounds, Oxides of Sulfur (SOx),

**Substance Registry System:** Sulfur Dioxide (SO2)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:**

**Test Method:**

Unspecified

[EPA/OAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:**

0

**Compliance Verified:**

Unknown

**EMISSION LIMITS:**

**Case-by-Case Basis:**

BACT-PSD

**Other Applicable Requirements:**

SIP

**Other Factors Influence Decision:**

Unknown

**Emission Limit 1:**

1.1600 LB/H

**Emission Limit 2:**

1.2200 T/YR PER ROLLING 12-MONTHS

**Standard Emission Limit:**

0

**COST DATA:**

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:**

0 \$/ton

**Incremental Cost Effectiveness:**

0 \$/ton

**Pollutant Notes:**



http://cfpub.epa.gov/rblc/index.cfm? action=PermitDetail.PollutantInfo&Facility\_ID=26197&Process\_ID=104091&Pollutant\_ID=1896&PermitControlEquipmentId=1432876

## Technology Transfer Network

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## Pollutant Information

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FINAL

**RBLC ID:** OH-0288

**Corporate/Company:** OWENS CORNING

**Facility Name:** OWENS CORNING MEDINA

**Process:** OXIDIZED ASPHALT FIXED ROOF STORAGE TANKS (3)

**Pollutant:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Pollutant Group (s):** InOrganic Compounds, Oxides of Sulfur (SOx),

**Substance Registry System:** [Sulfur Dioxide \(SO2\)](#)

**Pollution Prevention/Add-on Control Equipment/Both/No Controls Feasible:** N

**P2/Add-on Description:**

**Test Method:**

Unspecified

[EPA/DAR Methods](#)

[All Other Methods](#)

**Percent Efficiency:**

0

**Compliance Verified:**

Unknown

**EMISSION LIMITS:**

**Case-by-Case Basis:**

BACT-PSD

**Other Applicable Requirements:**

SIP

**Other Factors Influence Decision:**

Unknown

**Emission Limit 1:**

0.2100 LB/H EACH TANK

**Emission Limit 2:**

0.9400 T/YR EACH TANK, PER ROLLING 12-MONTHS

**Standard Emission Limit:**

0

**COST DATA:**

**Cost Verified?**

No

**Dollar Year Used in Cost Estimates:** 2005

**Cost Effectiveness:**

0 \$/ton

**Incremental Cost Effectiveness:**

0 \$/ton

**Pollutant Notes:**

LIMITS FOR EACH TANK ARE THE SAME REGARDLESS OF THE SIZE TANK.



[http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.FacilityInfo&facility\\_id=26197](http://cfpub.epa.gov/rblc/index.cfm?action=PermitDetail.FacilityInfo&facility_id=26197)  
Last updated on Friday, May 14, 2010

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### Facility Information

To learn more about the processes associated with this facility, click the Process List button.

You can then view pollutant information for each process.

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Date Entered:06/28/2005

Date Last Modified:08/23/2006

FINAL

**RBLC ID:** OH-0288  
**Corporate/Company:** OWENS CORNING  
**Facility Name:** OWENS CORNING MEDINA  
**Facility Description:** ASPHALT SHINGLE AND COATINGS MATERIALS MANUFACTURING

**State:** OH  
**County:** MEDINA  
**EPA Region:** 5

**Zip Code:** 44256  
**Country:** USA

#### Facility Contact Information:

**Name:** DON HART  
**Phone:** 3307647844

**E-Mail:** DON.HART@OWENSCORNING.COM

#### Agency Contact Information:

**Agency:** OH001 - OHIO ENVIRONMENTAL PROTECTION AGENCY  
**Contact:** MS. CHERYL SUTTMAN  
**Address:** OH ENV. PROTECTION AGENCY  
DIV OF AIR POLLUTION CONTROL  
LAZARUS GOVERNMENT CENTER  
P. O. BOX 1049  
COLUMBUS, OH 43215-1049  
**Phone:** (614) 644-3617  
**Other Agency Contact Info:**

[EXIT Disclaimer](#) [Agency Link](#)

**Permit Number:** 16-02347

**Permit Type:** C: Modify process at existing facility

**PERMIT URL:**

#### EST/ACT DATE

**Application Accepted Date:** ACT 03/31/2004  
**Permit Issuance Date:** ACT 06/14/2004  
**FRS Number:** 110000298919  
**SIC Code:** 2952  
**NAICS Code:** 324121

#### Affected Class I / U.S. Border Area:

No affected Class 1 areas identified.

**Facility-Wide Emission Increase/Decrease:**  
(After prevention/control measures)

Pollutant	Increase (+)/Decrease (-), Tons/Year
Carbon Monoxide	141.6200
Nitrogen Oxides (NOx)	30.3700
Particulate Matter (PM)	14.6500
Sulfur Oxides (SOx)	39.7000
Volatile Organic Compounds (VOC)	142.5600

**Other Permitting Information:**

OWENS CORNING IS INCREASING FACILITY CAPACITY AND MODIFYING EXISTING EQUIPMENT. THIS PERMIT IS CONSIDERED SIGNIFICANT FOR PSD FOR VOC, SO2, AND CO.

**Javier Galvan - Re: BMC/GAF - Permit No. 7711A**

---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**Date:** 7/27/2010 12:29 PM  
**Subject:** Re: BMC/GAF - Permit No. 7711A  
**CC:** "Harris, Doug" <dharris@gaf.com>, Christine Chambers  
<CChambers@trinityconsultants.com>, Latha Kambham  
<LKambham@trinityconsultants.com>

---

Javier,

Thank you very much for providing the status update on the NO2 1-hour NAAQS modeling and the Draft NSR Permit for GAF Dallas Plant.

GAF's legal counsel has already requested a direct referral and the preliminary case hearing is set for August 16th. Therefore, we respectfully request you to expedite the managerial review and complete the process before August 16th, so that the amended NSR permit can be issued before August 23rd, if the Judge dismisses the case on August 16th.

GAF does not wish to revisit the modeling for SO2 1-hour NAAQS compliance.

Once again, thank you very much providing the status update.

Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
12770 Merit Drive, Suite 900  
Dallas, TX 75251  
Tel: 972-661-8100  
Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)

\*\*\*\*\*

**From:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**To:** "Latha Kambham" <LKambham@trinityconsultants.com>  
**Date:** 07/27/2010 12:14 PM  
**Subject:** BMC/GAF - Permit No. 7711A

---



**Javier Galvan - Re: BMC - Permit No. 7711A**

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 7/27/2010 12:23 PM  
**Subject:** Re: BMC - Permit No. 7711A  
**Attachments:** Notice of Hearing 7711A.pdf

---

Javier,  
I thought I had forwarded this to you but I guess I may have not. The preliminary hearing for this case is August 16. Attached is the notice. If someone appears at the hearing and is granted party status then we may have an issue. Otherwise, we will need to be prepared to have this permit issued if no one shows up and the judge remands the case to the ED for uncontested processing.  
I'll keep you informed.  
Erin

>>> Javier Galvan 7/27/2010 11:58 AM >>>  
Erin,

I have received the modeling report for demonstration of compliance with the 1-hr NO2 standard (NAAQS). The application is once again technically complete for all current rules and regulations. Mike Gould informed me that BMC's legal counsel may wish to expedite the direct referral process, if it of course has not already, because if the agency has not issued the amended permit before August 23rd, then BMC will have to submit more modeling for demonstration of compliance with the expected new 1-hr and 24-hr SO2 NAAQS. I will also inform the consultant for BMC that the project is technically complete. Thank you.

Javier

**NOTICE OF HEARING  
BUILDING MATERIALS CORPORATION OF AMERICA  
SOAH Docket No. 582-10-5031  
TCEQ Docket No. 2010-0896-AIR  
Proposed Permit No. 7711A**

**APPLICATION.** Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. The facility will emit the following air contaminants: particulate matter including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides.

The TCEQ executive director has prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Fort Worth Regional Office, and at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the Texas Commission on Environmental Quality Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

**DIRECT REFERRAL.** The Notice of Application and Preliminary Decision was published on March 11, 2010. On June 2, 2010, the Applicant filed a request for direct referral to the State Office of Administrative Hearings (SOAH). Therefore, the chief clerk has referred this application directly to SOAH for a hearing on whether the application complies with all applicable statutory and regulatory requirements.

**CONTESTED CASE HEARING.** The State Office of Administrative Hearings (SOAH) will conduct a formal contested case hearing at:

**10:00 a.m. – August 16, 2010  
William P. Clements Building  
300 West 15<sup>th</sup> Street, 4<sup>th</sup> Floor  
Austin, Texas 78701**

The contested case hearing will be a legal proceeding similar to a civil trial in state district court.

The hearing will be conducted in accordance with the Chapter 2001, Texas Government Code; Chapter 382, Texas Health and Safety Code; TCEQ rules including 30 Texas Administrative Code (TAC) Chapter 116, Subchapters A and B; and the procedural rules of the TCEQ and SOAH, including 30 TAC Chapter 80 and 1 TAC Chapter 155.

To request to be a party, you must attend the hearing and show you would be affected by the application in a way not common to the general public. Any person may attend the hearing and request to be a party. Only persons named as parties may participate at the hearing.

**INFORMATION.** If you need more information about the hearing process for this application, please call the Office of Public Assistance, Toll Free, at 1-800-687-4040. General information regarding the TCEQ can be found at [www.TCEQ.state.tx.us](http://www.TCEQ.state.tx.us).

Persons with disabilities who need special accommodations at the hearing should call the SOAH Docketing Department at 512-475-3445, at least one week prior to the hearing.

Further information may also be obtained from Building Materials Corporation of America at the address stated above or by calling Mr. Doug Harris, Plant Engineer, at 214-637-8909.

Issued: July 6, 2010

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LaDonna Castañuela, Chief Clerk  
Texas Commission on Environmental Quality

**Javier Galvan - BMC/GAF - Permit No. 7711A**

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**From:** Javier Galvan  
**To:** Kambham, Latha  
**Date:** 7/27/2010 12:13 PM  
**Subject:** BMC/GAF - Permit No. 7711A

---

Latha,

I just received the modeling audit report informing us that everything proposed has been deemed acceptable in terms of protocol and the expected results/off-property impacts/compliance with the new 1-hr NO2 NAAQS. I have informed the staff attorney of the ELD that the project is once again technically complete, and she should be filling the approved RTC with the OCC soon (I imagine that the legal counsel of BMC can check that with her.)

I do not have to update/change anything with the special conditions or the MAERT of the permit, hence the permit should still be approved as is, and no changes should be warranted. I need to update my technical report, but that should not require considerable additional managerial review since the project had already been reviewed and approved. Management will only see the updates pertaining to the 1-hr NO2 results that I will provide.

I believe the next step is the direct referral process with SOAH and legal counsel of BMC. Mike Gould informed me that BMC's legal counsel may wish to expedite the direct referral process with SOAH, if it of course has not already done so, because if the agency does not issue the amended NSR permit before August 23rd, then BMC will have to revisit the modeling update routine for the new/expected 1-hr and 24-hr SO2 NAAQS the same way it had to for the 1-hr NO2 NAAQS, which I am sure BMC wishes to avoid.

Let me know if you have any questions. Thanks.

Javier


Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400


# Texas Commission on Environmental Quality

## INTEROFFICE MEMORANDUM

To: Javier Galvan, P.E.  
Mechanical/Agricultural/Construction Section

Date: July 27, 2010

Thru:  Daniel Menendez, Team Leader  
Air Dispersion Modeling Team (ADMT)

From: Rachel Gould and Albert Kennedy   
ADMT

Subject: Modeling Audit – Building Materials Corporation of America (RN100788959)

### 1.0 Project Identification Information.

Permit Application Number: 7711A

NSR Project Number: 143272

ADMT Project Number: 3320

NSRP Document Number: 399077

County: Dallas

ArcReader Published Map: \\Msgiswrk\APD\MODEL PROJECTS\3320\3320.pmf

Modeling Report: Submitted by Trinity Consultants, July 2010, on behalf of Building Materials Corporation of America.

### 2.0 Report Summary. The modeling analysis is acceptable. The results are summarized below.

Table 1. Modeling Results for Minor NSR NAAQS AOI				
Pollutant	Scenario	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	De Minimis ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	1	1-hr	29	10
	2		31	

The de minimis value of 10  $\mu\text{g}/\text{m}^3$  listed in Table 1 was an interim de minimis value for 1-hr NO<sub>2</sub> at the time the modeling was conducted.

Table 2. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)						
Pollutant	Scenario	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	Background ( $\mu\text{g}/\text{m}^3$ )	Total Conc. = [Background + GLCmax] ( $\mu\text{g}/\text{m}^3$ )	Standard ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	1	1-hr	83	103	186	188
	2		82		185	

The maximum five-year average of the high-eighth-high (H8H) 1-hr average model concentrations was used as the GLCmax for each scenario.

The background concentration for 1-hr NO<sub>2</sub> was obtained from the EPA AIRS monitor 481130069 located at 1415 Hinton Street, Dallas, Dallas County. The applicant used a three-year average of the 98th percentile of the annual distribution of daily maximum 1-hr concentrations from 2007-2009. The use of this monitor is appropriate since it is the closest NO<sub>2</sub> monitor to the site (approximately 3 miles to the north), and the monitor is located in an urban area near roads and highways.

- 3.0 Land Use. Medium roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the topographic map, DEMs, aerial photography, and the AERSURFACE analysis conducted by the ADMT. The selection of medium roughness is reasonable.
- 4.0 Modeling Emissions Inventory. The modeled emission point and area source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

A NO<sub>x</sub> to NO<sub>2</sub> conversion factor of 0.75 was applied to the modeled NO<sub>x</sub> emission rates.

Two scenarios were modeled to show compliance with the NAAQS since EPNs 8 and 8A do not operate simultaneously. Scenario 1 included EPN 8A and all other sources except EPN 8. Scenario 2 included EPN 8 and all sources except EPN 8A.

- 5.0 Building Wake Effects (Downwash). Input data to Building Profile Input Program Prime (Version 04274) are consistent with the aerial photography, plot plan, and modeling report.
- 6.0 Meteorological Data.  
Surface Station and ID: Dallas, TX (Station #: 3927)  
Upper Air Station and ID: Stephenville, TX (Station #: 13901)  
Meteorological Dataset: 1985, 1987-1990  
Profile Base Elevation: 168 meters
- 7.0 Receptor Grid. The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations.
- 8.0 Model Used and Modeling Techniques. AERMOD (Version 09292) was used in a refined screening mode.

**From:** Albert Kennedy  
**To:** Galvan, Javier  
**Date:** 7/23/2010 11:21 AM  
**Subject:** Building Materials Corporation

Javier,

We noticed in the modeling that they modeled one source group with EPN 8 and all other sources except EPN 8A and another source group with EPN 8A and all other sources except EPN 8. This is OK so long as EPN 8 and EPN 8A cannot operate simultaneously. Is there going to be a permit condition that doesn't allow EPN 8 and EPN 8A to operate simultaneously? Thanks.

Albert

**Javier Galvan - Re: GAF Dallas Project**

---

**From:** Javier Galvan  
**To:** Kennedy, Albert  
**Date:** 7/7/2010 3:07 PM  
**Subject:** Re: GAF Dallas Project

---

Albert,

For question 1): Yes, the emission rates in the modeling report look good to me. They coincide with what I had reviewed and approved for the MAERT (the permit).

For question 2): I asked the consultant, who performed the modeling, and she responded with the following:

The full-impact analysis included all of the heaters (permitted under NSR permit as well as PBRs).

It is my understanding that the consultant considered the incinerator, the waste heat recovery boiler, and the heaters, i.e. everything that exists at the site, whether authorized under the NSR permit or under PBR. Hope that answers your questions. Please let me know if you need anything else. Thanks.

Javier

>>> Albert Kennedy 7/7/2010 9:22 AM >>>

Javier,

We received the modeling report for this project from Dan Jamieson since the applicant sent it to him. We just have a couple of questions for you:

- 1) Do the emission rates in the modeling report look good to you?
- 2) Are there any PBR sources included in the 1-hr NO2 modeling?

Thanks

Albert



**Javier Galvan - Re: GAF - NSR Permit No. 7711A**

---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**Date:** 7/7/2010 2:57 PM  
**Subject:** Re: GAF - NSR Permit No. 7711A

---

Javier,

The full-impact analysis included all of the heaters (permitted under NSR permit as well as PBRs).

Please let us know if you need additional details.

Thanks  
Latha

\*\*\*\*\*  
Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
12770 Merit Drive, Suite 900  
Dallas, TX 75251  
Tel: 972-661-8100  
Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)  
\*\*\*\*\*

From: "Javier Galvan" <JGalvan@tceq.state.tx.us>  
To: "Latha Kambham" <LKambham@trinityconsultants.com>  
Date: 07/07/2010 02:43 PM  
Subject: GAF - NSR Permit No. 7711A

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Latha,

ADMT asked the following question: Are there any PBR sources included in the 1-hr NO2 modeling?

Hence, my question to you is, did the model include not only the incinerator (EPN 8/8A) and the waste heat recovery boiler (EPN WHBLR1), but also the individual heaters on the tanks (EPNs HTR3, 4, 5, and 6) and the asphalt heater (EPN 28)? Did it also include the heaters under PBR (EPNs HTR1, 7, and 8)?

**Javier Galvan - GAF - NSR Permit No. 7711A**

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**From:** Javier Galvan  
**To:** Kambham, Latha  
**Date:** 7/7/2010 2:42 PM  
**Subject:** GAF - NSR Permit No. 7711A

---

Latha,

ADMT asked the following question: Are there any PBR sources included in the 1-hr NO2 modeling?

Hence, my question to you is, did the model include not only the incinerator (EPN 8/8A) and the waste heat recovery boiler (EPN WHBLR1), but also the individual heaters on the tanks (EPNs HTR3, 4, 5, and 6) and the asphalt heater (EPN 28)? Did it also include the heaters under PBR (EPNs HTR1, 7, and 8)?

I think that I have read this (in the Modeling Results Letter from 7.1.10; why they are asking this question specifically, I do not know), but I wanted to confirm it with you first before responding to the folks in ADMT conducting the audit.

Thanks.

Javier

**Javier Galvan - Fwd: RE: OCC NOTICE OF HEARING**

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**From:** Javier Galvan  
**To:** Jamieson, Daniel  
**Date:** 7/6/2010 4:27 PM  
**Subject:** Fwd: RE: OCC NOTICE OF HEARING  
**CC:** Selvera, Erin  
**Attachments:** NOH 7711A.pdf

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Dan,

As requested by the staff attorney in OLS for this project, I have forwarded the Notice of Hearing to you in case a hearing does occur and someone from ADMT is needed to testify. Thank you.

Javier

>>> Leslie Gann 7/6/2010 3:48 PM >>>  
RE: OCC NOTICE OF HEARING

This is notification that a notice of hearing was processed by the Office of the Chief Clerk and is being transmitted as an attachment to this email.

**Javier Galvan - Re: Hearing Set for BMC**

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**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 7/6/2010 4:19 PM  
**Subject:** Re: Hearing Set for BMC

---

Forward the hearing info to ADMT because if we do have a hearing we will need that person to testify. - Thanks.

>>> Javier Galvan 7/6/2010 4:09 PM >>>  
Erin,

Yes, we have received all the technical information that we needed in order to proceed with the review of the new NAAQS. The work leader of ADMT informed me this morning that he had received all of the modeling data and information that he needed, and he will assign the project to someone in ADMT for it to be audited. Hopefully after the audit, no further information and/or modeling will be needed from the applicant. I will not know this until after ADMT completes its audit of the modeling results. At this time, I cannot say with any certainty how long that will be.

Javier

>>> Erin Selvera 7/6/2010 3:55 PM >>>

We received the attached Notice of Hearing (Preliminary hearing on August 16, 2010) on BMC from the Chief Clerk today. Did we ever get the rest of the info we needed from the Applicant? Their attorney is aware that we will request an abatement if we are not done with our tech review of the additional information. (assuming that someone shows up to the prelim and the case is not remanded to the ED as uncontested)

**Javier Galvan - Re: Hearing Set for BMC**

---

**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 7/6/2010 4:09 PM  
**Subject:** Re: Hearing Set for BMC  
**CC:** Gould, Mike; Harrison, Booker

---

Erin,

Yes, we have received all the technical information that we needed in order to proceed with the review of the new NAAQS. The work leader of ADMT informed me this morning that he had received all of the modeling data and information that he needed, and he will assign the project to someone in ADMT for it to be audited. Hopefully after the audit, no further information and/or modeling will be needed from the applicant. I will not know this until after ADMT completes its audit of the modeling results. At this time, I cannot say with any certainty how long that will be.

Javier

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**Javier Galvan - Hearing Set for BMC**

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 7/6/2010 3:55 PM  
**Subject:** Hearing Set for BMC  
**CC:** Gould, Mike; Harrison, Booker  
**Attachments:** Notice of Hearing 7711A.pdf

---

We received the attached Notice of Hearing (Preliminary hearing on August 16, 2010) on BMC from the Chief Clerk today. Did we ever get the rest of the info we needed from the Applicant? Their attorney is aware that we will request an abatement if we are not done with our tech review of the additional information. (assuming that someone shows up to the prelim and the case is not remanded to the ED as uncontested)

**Javier Galvan - RE: OCC NOTICE OF HEARING**

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**From:** Leslie Gann  
**To:** Casey Vise; Erin Selvera; Javier Galvan; OPIC  
**Date:** 7/6/2010 3:48 PM  
**Subject:** RE: OCC NOTICE OF HEARING  
**Attachments:** NOH 7711A.pdf

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RE: OCC NOTICE OF HEARING

This is notification that a notice of hearing was processed by the Office of the Chief Clerk and is being transmitted as an attachment to this email.

**NOTICE OF HEARING**  
**BUILDING MATERIALS CORPORATION OF AMERICA**  
**SOAH Docket No. 582-10-5031**  
**TCEQ Docket No. 2010-0896-AIR**  
**Proposed Permit No. 7711A**

**APPLICATION.** Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. The facility will emit the following air contaminants: particulate matter including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides.

The TCEQ executive director has prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Fort Worth Regional Office, and at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the Texas Commission on Environmental Quality Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

**DIRECT REFERRAL.** The Notice of Application and Preliminary Decision was published on March 11, 2010. On June 2, 2010, the Applicant filed a request for direct referral to the State Office of Administrative Hearings (SOAH). Therefore, the chief clerk has referred this application directly to SOAH for a hearing on whether the application complies with all applicable statutory and regulatory requirements.

**CONTESTED CASE HEARING.** The State Office of Administrative Hearings (SOAH) will conduct a formal contested case hearing at:

**10:00 a.m. – August 16, 2010**  
**William P. Clements Building**  
**300 West 15<sup>th</sup> Street, 4<sup>th</sup> Floor**  
**Austin, Texas 78701**

The contested case hearing will be a legal proceeding similar to a civil trial in state district court.



The hearing will be conducted in accordance with the Chapter 2001, Texas Government Code; Chapter 382, Texas Health and Safety Code; TCEQ rules including 30 Texas Administrative Code (TAC) Chapter 116, Subchapters A and B; and the procedural rules of the TCEQ and SOAH, including 30 TAC Chapter 80 and 1 TAC Chapter 155.

To request to be a party, you must attend the hearing and show you would be affected by the application in a way not common to the general public. Any person may attend the hearing and request to be a party. Only persons named as parties may participate at the hearing.

**INFORMATION.** If you need more information about the hearing process for this application, please call the Office of Public Assistance, Toll Free, at 1-800-687-4040. General information regarding the TCEQ can be found at [www.TCEQ.state.tx.us](http://www.TCEQ.state.tx.us).

Persons with disabilities who need special accommodations at the hearing should call the SOAH Docketing Department at 512-475-3445, at least one week prior to the hearing.

Further information may also be obtained from Building Materials Corporation of America at the address stated above or by calling Mr. Doug Harris, Plant Engineer, at 214-637-8909.

Issued: July 6, 2010

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LaDonna Castañuela, Chief Clerk  
Texas Commission on Environmental Quality

## Javier Galvan - GAF Dallas Plant - NO2 1-hour NAAQS Modeling Analysis Results

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**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**Date:** 7/1/2010 4:45 PM  
**Subject:** GAF Dallas Plant - NO2 1-hour NAAQS Modeling Analysis Results  
**CC:** "Daniel Menendez" <DMenende@tceq.state.tx.us>, "Javier Galvan" <JGalvan@tceq.state.tx.us>, "Harris, Doug" <dharris@gaf.com>, Christine Chambers <CChambers@trinityconsultants.com>, Latha Kambham <LKambham@trinityconsultants.com>  
**Attachments:** GAF NO2 1-hr Modeling Results\_Letter Final (0701-2010).pdf

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Dan,

Per your request, GAF completed the NO2 1-hour NAAQS modeling analysis based on the modeling approach discussed with the TCEQ. Please find attached an electronic copy of the submittal that includes the modeling analysis and results.

A hard-copy of this submittal is also being sent to you via FedEx overnight delivery. The original version of the hard-copy submittal (addressed to Dan Jamieson) includes a CD with the AERMOD input/output files and other modeling files, as listed in Section 3 of this submittal.

GAF respectfully requests that TCEQ review the submittal as soon as possible in order to expedite the permit issuance and meet the Agreed Order deadline.

Please feel free to contact us, if you have any questions or need additional information.

Thanks  
Latha

\*\*\*\*\*  
Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
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 Dallas, TX 75251  
 Tel: 972-661-8100  
 Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)

\*\*\*\*\*

July 1, 2010

Mr. Daniel R. Jamieson  
Air Dispersion Modeling Team  
Texas Commission on Environmental Quality  
12100 Park 35 Circle, Mail Code 163  
Austin, TX 78753

*Re: NAAQS NO<sub>2</sub> 1-hour Compliance Demonstration  
Building Materials Corporation of America – Dallas Plant – Dallas County  
TCEQ Account No. DB-0378-S,  
TCEQ Customer Number (CN) 602717464, Regulated Entity Number (RN) 100788959*

Dear Mr. Jamieson:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the Texas Commission of Environmental Quality (TCEQ) on December 18, 2008 (hereby referred as “2008 NSR permit amendment application”). As a part of this permit amendment application, GAF submitted an air dispersion modeling report on May 5, 2009 (hereby referred as “2009 air dispersion modeling submittal”). On May 11, 2010, TCEQ requested an air dispersion modeling analysis to demonstrate that emissions of nitrogen dioxide (NO<sub>2</sub>) would not cause or contribute to a violation of the newly promulgated NO<sub>2</sub> 1-hour National Ambient Air Quality Standard (NAAQS).<sup>1,2</sup>

A memorandum summarizing the proposed modeling approach, which is followed in this modeling analysis, was submitted to the TCEQ via email on May 19, 2010.<sup>3</sup> The air dispersion modeling approach was discussed with the TCEQ via a conference call on May 20, 2010 with a summary of the call submitted to all attendees later that afternoon.<sup>4,5</sup> GAF conducted the NO<sub>2</sub> 1-hour NAAQS modeling analysis, based on the guidance received from the TCEQ during the conference call on May 20, 2010, and

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<sup>1</sup> Per email from Mr. Javier Galvan (TCEQ) to Ms. Latha Kambham (Trinity Consultants) on May 11, 2010.

<sup>2</sup> The new NO<sub>2</sub> 1-hour NAAQS was published in the Federal Register (75 FR 6474) on February 9, 2010, and went into effect on April 12, 2010.

<sup>3</sup> Proposed modeling approach memo submitted to Mr. Daniel Jamieson (TCEQ) via email from Ms. Latha Kambham (Trinity Consultants) on May 19, 2010.

<sup>4</sup> Conference call regarding proposed NO<sub>2</sub> 1-hr modeling approach. Attendees: Mr. Daniel Jamieson and Mr. Javier Galvan (TCEQ), Mr. Doug Harris and Mr. Fred Bright (GAF), Mr. Rodman Johnson (Brown McCarroll), and Ms. Christine Chambers and Ms. Latha Kambham (Trinity Consultants).

<sup>5</sup> Approved modeling approach memo submitted to Mr. Daniel Jamieson (TCEQ) via email from Ms. Latha Kambham (Trinity Consultants) on May 20, 2010.

subsequent guidance received via emails from the TCEQ.<sup>6</sup> The modeling approach used for the analysis and the modeling results are provided in this letter.

For the NO<sub>2</sub> 1-hour NAAQS compliance demonstration, GAF used the same approach for the modeled source parameters, building wake effects, receptor grids, and meteorological data as detailed in the May 2009 air dispersion modeling report, with the following updates:

- Stack height for the following Emission Point Numbers (EPNs) were updated to 57 feet:
  - EPN 8A: Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack
  - EPN WHBLR1: Waste Heat Recovery Boiler Natural Gas Burner Side
  - EPN HTR7: Asphalt flux heater
  - EPN HTR8: Filled coating heat exchanger heater

Due to the updates to the stack heights for the above mentioned sources, the building wake effects (downwash) were re-evaluated in terms of their proximity to nearby structures.

- The most current version of the AERMOD terrain preprocessor (AERMAP version 09040) was used to update the terrain elevations for the sources, receptors, hill heights for receptors, and buildings.
- The most current version of the AERMOD model (version 09292) was used to obtain the air quality modeling results.

As noted, the modeling was otherwise conducted as per the previously submitted May 2009 report. Please refer to that report for information concerning all other modeled source parameters, building wake effects, receptor grids, and meteorological data. A revised TCEQ Table 1(a) listing the updated stack heights for the above noted EPNs is provided in Attachment 1 of this letter. The specific modeling approach that was used in the NAAQS Analysis for the NO<sub>2</sub> 1-hour modeling is provided below.

## **1. AIR QUALITY DISPERSION MODELING APPROACH**

### **1.1 SIGNIFICANCE ANALYSIS**

The Significance Analysis considers the emissions associated with only the proposed project to determine whether it will have a significant impact upon the surrounding area. As stipulated in the 2008 NSR permit amendment application, there are three sources that result in an emissions increase of nitrogen oxides (NO<sub>x</sub>). Table 1 below lists these sources and the emission rates. The emission increases were

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<sup>6</sup> Email communications between Mr. Daniel Jamieson (TCEQ) and Ms. Latha Kambham (Trinity Consultants) on May 24, 2010 and June 2, 2010.

used in the NO<sub>2</sub> (1-hour) Significance Analysis. Per the Ambient Ratio Method, the NO<sub>x</sub> emissions were multiplied by 0.75 to convert to NO<sub>2</sub> emission rates for air dispersion modeling purposes.<sup>7</sup>

**TABLE 1. EMISSION SOURCES AND NO<sub>x</sub> EMISSION RATES FOR SIGNIFICANCE ANALYSIS**

EPN	Source Description	Currently Permitted Emission Rate (lb/hr)	Proposed Allowable Emission Rate (lb/hr)	Increase in Emission Rate (lb/hr)
8	Thermal Oxidizer Exhaust Stack	0.72	1.90	1.18
8A	Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack			
WHBLR1	Waste Heat Recovery Boiler Natural Gas Burner Side	--	0.47	0.47

The air quality dispersion modeling analysis was conducted with 5 years of meteorological data. The meteorological data for Dallas County was obtained from the TCEQ's website for 1985, 1987, 1988, 1989, and 1990.<sup>8</sup> In the Significance Analysis, the highest first high (H1H) maximum modeled ground-level concentration (GLC<sub>max</sub>) of NO<sub>2</sub> was compared to the interim modeling significance level (MSL) of 10 µg/m<sup>3</sup>.<sup>9</sup> Similar to the 2009 air dispersion modeling submittal (discussed in Section 6.1.3 of the modeling report), the following source group scenarios were modeled in each of the modeling analyses presented in this letter.

**TABLE 2. SOURCE GROUP SCENARIOS**

Source Group	Source Group Description
Scenario 1	EPN 8A with all other EPNs <sup>1</sup>
Scenario 2	EPN 8 with all other EPNs <sup>1</sup>

<sup>1</sup> When EPN 8A is included in the source group, EPN 8 is excluded and vice versa. For the Significance Analysis, the only other EPN modeled was WHBLR1 as outlined in Table 1.

A zip folder containing the electronic copies of the modeling files used in the Significance Analysis is provided with this submittal. Based on the Significance Analysis modeling results, the H1H GLC<sub>max</sub> for NO<sub>2</sub> exceeds the applicable MSL. Therefore, a Full Impact Analysis was conducted as explained below.

## **1.2 FULL IMPACT ANALYSIS – SCREENING ANALYSIS**

During the conference call with TCEQ on May 20, 2010, a Full Impact Analysis - Screening Analysis was discussed where the screening background concentration would be added to the results of the

<sup>7</sup> Per EPA discussions during the EPA Regional/State/Local Dispersion Modelers Workshop, Portland, OR, May 10-13, 2010.

<sup>8</sup> <ftp://ftp.tceq.state.tx.us/pub/OPRR/APD/AERMET/AERMETv06341/AERMETDataSetsByCounty/>

<sup>9</sup> Per the interim guidance provided by EPA during the EPA Regional/State/Local Dispersion Modelers Workshop, Portland, OR, May 10-13, 2010.

Significance Analysis and compared to 90% of the NAAQS. GAF did not pursue the use of this approach. As such, a Full Impact Analysis – Inventory modeling analysis was performed.

### 1.3 FULL IMPACT ANALYSIS – INVENTORY MODELING

As a first step in the Full Impact Analysis, the radius of impact (ROI) was determined. The largest ROI among all five modeled years was determined as 0.46 km based on the significance modeling analysis results. The current off-site inventories of maximum allowable emission rates for industrial sources were obtained from the TCEQ Point Source Data Base (PSDB) for use in the NAAQS analysis.<sup>10</sup> Per guidance from the TCEQ, the primary search option was selected for the request of the TCEQ PSDB.<sup>11</sup> For this analysis, a conservative (i.e., larger than required) area of impact (AOI) with a radius of 55 km was used in the PSDB inventory retrieval. The TCEQ PSDB inventories for NO<sub>x</sub> obtained from TCEQ are included in electronic format with this submittal. The modeling approach for the TCEQ-PSDB is consistent with the 2009 air dispersion modeling submittal (discussed in the Section 6.2 of the modeling report).

Additionally, GAF identified discrepancies between the New Source Review (NSR) authorizations and the TCEQ PSDB for “Americans Airlines Inc” and “DSI Transport Inc” emissions sources. Therefore, NSR authorizations available through TCEQ’s remote document server and the TCEQ Austin File Room were reviewed to ensure that emission rates provided in the PSDB were accurate for sources located at “Americans Airlines Inc” and “DSI Transport Inc” facilities. Upon reviewing these files, the TCEQ PSDB inventory was updated as outlined in Attachment 3.

For the Full Impact Analysis, all permitted sources at the GAF Dallas Plant that emit NO<sub>x</sub> [except EPN BLR5 (Standby Boiler)] were modeled with their potential-to-emit (PTE) emissions along with the off-property inventory sources.<sup>12</sup> The permit allowable emission rates for NO<sub>x</sub> were multiplied by 0.75 to convert to NO<sub>2</sub> emission rates for air dispersion modeling purposes, per the Ambient Ratio Method. A table summarizing the modeled source ID, description, source representation, and associated source parameters for all modeled emission sources that emit NO<sub>x</sub> at the GAF Dallas Plant is included in Attachment 2.

In the Full Impact Analysis, only those receptors with modeled impacts greater than the MSL in the Significance Analysis are modeled. The form of the new NO<sub>2</sub> 1-hour NAAQS is “the 3-year average of the 98<sup>th</sup> percentile of the annual distribution of daily maximum 1-hour concentrations”.<sup>13</sup> In the Full Impact Analysis, the highest eighth high (H8H) GLC<sub>max</sub> was obtained for each of the five modeled meteorological years. The average of the H8H GLC<sub>max</sub> was then added to the background concentration

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<sup>10</sup> PSDB retrieval was obtained via email from Mr. Robert Organ (TCEQ) to Ms. Latha Kambham (Trinity Consultants) on May 20, 2010.

<sup>11</sup> Per guidance provided by Mr. Dan Schultz (TCEQ) to Ms. Jacquie Hui (Trinity Consultants), via telephone conversation on May 20, 2010.

<sup>12</sup> EPN BLR5 is a standby boiler, authorized to operate 500 hours per year. This boiler will only be operated when the Thermal Oxidizer and the Waste Heat Boiler units are shut down. Therefore, EPN BLR5 is not included in the modeling analysis.

<sup>13</sup> *Primary National Ambient Air Quality Standards for Nitrogen Dioxide; Final Rule*, Federal Register, Volume 75, No. 26, February 9, 2010, pp 6474-6537.

(discussed in Section 1.4 of this letter) and compared to the NAAQS. If the resulting concentration is below the NAAQS, the demonstration is complete.

#### 1.4 NO<sub>2</sub> (1-HOUR) BACKGROUND CONCENTRATION

The impacts of emissions from the on-property and off-property sources are modeled in the air quality dispersion modeling analysis to demonstrate compliance with the 1-hour NO<sub>2</sub> NAAQS. Modeled ambient air concentrations only reflect the impacts from industrial emission sources. Therefore, to completely assess compliance with the NAAQS, “background” concentrations are typically added to the modeled ground-level concentrations. These background concentrations are representative of emissions from natural sources, nearby emissions sources other than the emission sources under consideration, and unidentified emission sources. The detailed methodology used in determining the NO<sub>2</sub> 1-hour background concentration was provided to the TCEQ via email on May 26, 2010.<sup>14</sup> However, for completeness of the submittal, these details are also included in this letter.

The GAF Dallas Plant is located at 2600 Singleton Blvd, Dallas, Dallas County, Texas. Currently, there are three active State and Local Air Monitoring Systems (SLAMS) monitoring stations for NO<sub>2</sub> located in the Dallas County.<sup>15</sup> A table summarizing the site ID, address, and approximate distance from the GAF Dallas Plant for each of these three monitors is provided below:

TABLE 3. SLAMS LOCATED IN THE DALLAS COUNTY

EPA Site ID	Address	Approximate Distance from GAF Dallas Plant
48-113-0069	1415 Hinton Street, Dallas	3 miles North
48-113-0075	12532 1/2 Nuestra Drive, Dallas	10 miles Northeast
48-113-0087	3277 W. Redbird Lane, Dallas	7 miles South

GAF used the Site ID 48-113-0069 to obtain the NO<sub>2</sub> background concentration based on the following:

- EPA Air Quality System (AQS) provides the highest 1<sup>st</sup> high (H1H), highest 2<sup>nd</sup> high (H2H), and annual NO<sub>2</sub> concentration values for 1998-2008 for the above mentioned monitoring stations. Site ID 48-113-0069 monitored the highest concentration values for H1H, H2H, and annual averaging periods for 8 of the 10 years. Furthermore, the trend in recent years (based on 2007 and 2008 year information) indicates higher monitored values for Site ID 48-113-0069, when compared with the other two monitoring stations.
- This monitor is located at the closest proximity to the GAF Dallas Plant.

Therefore, GAF used this monitor to obtain the NO<sub>2</sub> background concentration for the NO<sub>2</sub> 1-hour NAAQS Analysis.

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<sup>14</sup> NO<sub>2</sub> 1-hour background concentration determination method submitted to Mr. Daniel Jamieson (TCEQ) via email from Ms. Latha Kambham (Trinity Consultants) on May 26, 2010.

<sup>15</sup> Information is obtained from EPA Air Database (URL: <http://www.epa.gov/oar/data/geosel.html>)

Per EPA guidance, the background concentration for the NO<sub>2</sub> (1-hour) NAAQS analysis should be calculated as the 3-year average of the 8<sup>th</sup>-highest daily maximum 1-hour concentrations over three years of monitor data.<sup>16</sup> Currently, the EPA Air database does not process the NO<sub>2</sub> monitoring value based on the current form of the standard. Therefore, for determining the background concentration, the hourly NO<sub>2</sub> monitored values for EPA Site ID 48-113-0069 were obtained from the EPA AQS database for the most recent three years (2007-2009).<sup>17</sup> Under this EPA guidance, a day is classified as complete if it has at least 75% of the hourly concentrations recorded (i.e., at least 18 hours per day). A quarter is classified as complete if it has at least 75% of the sampling days with complete data (i.e., at least 67 to 69 depending on the quarter). A year is classified as complete if it has four complete quarters.<sup>18</sup> The obtained hourly values for EPA Site ID 48-113-0069 meet the above completeness criteria for all three years.

The average 98<sup>th</sup>-percentile daily maximum 1-hour concentration at the EPA monitor (Site ID: 48-113-0069) over 2007, 2008, and 2009 is 102.19 µg/m<sup>3</sup> as shown in Table 3 below. This value was used in the 1-hour NO<sub>2</sub> NAAQS compliance demonstration for the GAF Dallas Plant.

**TABLE 4. BACKGROUND CONCENTRATION SUMMARY**

Year	NO <sub>2</sub> Daily Maximum 1-hour Concentration (H8H)	
	(ppm)	(µg/m <sup>3</sup> )
2007	0.056	105.31
2008	0.056	105.31
2009	0.051	95.96
Average	0.054	102.19

A Microsoft (MS) Excel file [GAF Dallas Plant\_NO2 Background Concentration (052510).xlsx], which was used to calculate the background concentration at the EPA monitor (Site ID: 48-113-0069) is included in the electronic submittals. The monitored values are shown in tabs “2007 Monitored Value”, “2008 Monitored Value”, and “2009 Monitored Value” in the MS Excel file. To calculate the background concentration, the 8<sup>th</sup>-highest daily maximum 1-hour concentration was obtained [as shown in tabs “2007-H8H”, “2008-H8H”, and “2009-H8H” in the MS Excel file]. The average 8<sup>th</sup>-highest daily maximum 1-hour concentration was calculated, as provided in the “Summary” tab of this MS Excel file. This value was used as the representative background concentration in the 1-hour NO<sub>2</sub> NAAQS compliance demonstration.

<sup>16</sup> 75 Fed. Reg. 6474, “Primary National Ambient Air Quality Standards for Nitrogen Dioxide; Final Rule” (2010).

<sup>17</sup> <http://www.epa.gov/ttn/airs/airsaqs/detaildata/downloadaqsddata.htm>

<sup>18</sup> 75 Fed. Reg. at 6532.



## **2. MODELING RESULTS**

As discussed in Section 1.3 of this letter, the H8H NO<sub>2</sub> GLC<sub>max</sub> results were obtained at the significant receptors for all five modeled meteorological years. The average of H8H NO<sub>2</sub> GLC<sub>max</sub> was then added to the background concentration and then compared to the NAAQS. A summary of the NAAQS analysis results is presented in Table 5. As shown in Table 5, the total concentration (sum of average H8H GLC<sub>max</sub> and background concentration) is less than the applicable NAAQS. Therefore, the NAAQS compliance demonstration is complete.

**TABLE 5. NAAQS ANALYSIS RESULTS FOR NO<sub>2</sub> (1-HOUR)**

Pollutant	Averaging Period	Emission Source Group <sup>1</sup>	Emission Source Group Description	Meteorological Year	UTM Coordinate		Total Maximum Ground Level Concentration GLC <sub>MAX</sub> <sup>2</sup> (µg/m <sup>3</sup> )	Average of Maximum Ground Level Concentration Over 5 Years (µg/m <sup>3</sup> )	Background Concentration <sup>3</sup> (µg/m <sup>3</sup> )	Average Modeled Concentration + Background Concentration (µg/m <sup>3</sup> )	NAAQS (µg/m <sup>3</sup> )	Less than NAAQS?
NO <sub>2</sub>	1-hour	Scenario 1	8 with all other EPNs	1985	700,265	3,628,237	82.66	83.15	102.19	185.34	188	Yes
				1987	700,265	3,628,237	85.06					
				1988	700,265	3,628,237	79.08					
				1989	700,265	3,628,237	86.17					
				1990	700,265	3,628,237	82.80					
		Scenario 2	8A with all other EPNs	1985	700,265	3,628,237	80.91	81.65		183.84		Yes
				1987	700,265	3,628,237	83.21					
				1988	700,265	3,628,237	78.96					
				1989	700,265	3,628,237	84.39					
				1990	700,265	3,628,237	80.78					

<sup>1</sup> EPN BLR5 is a standby boiler, authorized to operate 500 hours per year. This boiler will only be operated when the Thermal Oxidizer and the Waste Heat Boiler units are shut down. Therefore, EPN BLR5 is not included in the modeling analysis.

<sup>2</sup> Total H8H Maximum Ground Level Concentration (GLC<sub>max</sub>) for the GAF Dallas Plant sources and TCEQ inventory sources obtained from AERMOD (version 09292) for met data years 1985, 1987, 1988, 1989, and 1990.

<sup>3</sup> Three years (2007 - 2009) average of 98<sup>th</sup> percentile of the annual distribution of daily 1-hour maximum concentration at the Dallas, Dallas County, at 1415 Hinton Street (site ID: 481130069).

### 3. ELECTRONIC FILES

The electronic data files are provided in Attachment 4 (on a CD), which include the following:

- All AERMOD input and output files used for the NO<sub>2</sub> (1-hour) analysis
- Meteorological files
- BPIPP input and output data files
- Background concentration calculation spreadsheets
- TCEQ PSDB Retrieval for NO<sub>2</sub>

The following tables summarize the electronic files included in the CD.

**TABLE 6. AERMOD INPUT AND OUTPUT DATA FILE DESCRIPTIONS FOR THE NO<sub>2</sub> 1-HOUR MODELING ANALYSIS**

Modeling	File Name	Associated Files	File Description	Receptor Grid
Significance Analysis	NSS85-90.zip	Input Files (*.ami) Output Files (*.aml) Plot Files (*.plt)	Significance Modeling analysis for 1985, 1987, 1988, 1989, and 1990 meteorological years	Property Line, Tight, Fine, Medium, and Coarse grids, including five sensitive receptor locations
Full Impact Analysis	NNS85-90.zip	Input Files (*.ami) Output Files (*.aml) Plot Files (*.plt)	Full Impact Analysis for 1985, 1987, 1988, 1989, and 1990 meteorological years	Significance Receptors

**TABLE 7. METEOROLOGICAL DATA FILES USED FOR THE AERMOD MODELING ANALYSIS**

File Name	Description
DFWS85BM.SFC DFWS87BM.SFC DFWS88BM.SFC DFWS89BM.SFC DFWS90BM.SFC	Surface meteorological files
DFWS85BM.PFL DFWS87BM.PFL DFWS88BM.PFL DFWS89BM.PFL DFWS90BM.PFL	Upper air meteorological files

**TABLE 8. DOWNWASH FILES USED FOR THE MODELING ANALYSIS**


Input File Name	Output File Name
Bpip input file	Bpip output file      Bpip summary file

**TABLE 9. OTHER FILES USED FOR THE AIR QUALITY DISPERSION MODELING ANALYSIS**

File Description	File Name
NO2 Background concentration calculations file	GAF Dallas Plant_NO2 Background Concentration (052610).xlsx
TCEQ PSDB Retrieval files	"TCEQ PSDB Retrieval" folder

If you have any questions regarding this submittal, please feel free to call me at (972) 661-8100 or Mr. Doug Harris of GAF at (214) 637-8909.

Sincerely,  
Trinity Consultants



Christine M. Otto Chambers  
Managing Consultant

**Attachments**

cc:     Mr. Tony Walker, TCEQ Regional Office 4  
         Mr. Javier Galvan, TCEQ Air Permits Division  
         Mr. Daniel Menendez, TCEQ Air Dispersion Modeling Team  
         Mr. David Miller, City of Dallas, Air Pollution Control Program  
         Mr. Doug Harris, GAF  
         Mr. Fred Bright, GAF  
         Mr. David Fuelleman, GAF

Mr. Jamieson – Page 11  
July 1, 2010

bc: Rod Johnson, Brown McCarroll

**ATTACHMENT 1. REVISED TABLE 1(A)**

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# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## Table 1(a) Emission Point Summary

Date	7/1/2010	Permit No.:	7711A	Regulated Entity No.:	100788959
Area Name:	GAF Materials Corporation, Dallas Facility			Customer Reference No.:	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA					
1. Emission Point			2. Component of Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		Pounds per Hour (A)	TPY (B)
HTR3	HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
			SO <sub>2</sub>	0.01	0.01
			PM <sub>10</sub>	0.01	0.02
			CO	0.04	0.18
			VOC	0.01	0.01
HTR4	HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO <sub>x</sub>	0.05	0.22
			SO <sub>2</sub>	0.01	0.01
			PM <sub>10</sub>	0.01	0.02
			CO	0.04	0.18
			VOC	0.01	0.01
HTR5	HTR5	Asphalt Heater for T-14 and T-15 coating Asphalt Storage and Coating Feed Loop	NO <sub>x</sub>	0.10	0.43
			SO <sub>2</sub>	0.01	0.01
			PM <sub>10</sub>	0.01	0.03
			CO	0.08	0.36
			VOC	0.01	0.02
BLR5	BLR5	Stand-by Boiler Vent	NO <sub>x</sub>	3.73	0.90
			SO <sub>2</sub>	0.02	<0.01
			PM <sub>10</sub>	0.28	0.07
			CO	3.13	0.75
			VOC	0.20	0.05

TCEQ-10153 [Revised 04/08] Table 1(a)

This form is for use by sources subject to air quality permit requirements and may be revised periodically. [APDG 5178 v5]

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
**Table 1(a) Emission Point Summary**

<b>Date</b>	7/1/2010	<b>Permit No.:</b>	7711A	<b>Regulated Entity No.:</b>	100788959
<b>Area Name:</b>	GAF Materials Corporation, Dallas Facility			<b>Customer Reference No.:</b>	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

<b>AIR CONTAMINANT DATA</b>					
<b>1. Emission Point</b>			<b>2. Component of Air Contaminant Name</b>	<b>3. Air Contaminant Emission Rate</b>	
<b>(A) EPN</b>	<b>(B) FIN</b>	<b>(C) NAME</b>		<b>Pounds per Hour (A)</b>	<b>TPY (B)</b>
8 8A	TO1 8A	Thermal Oxidizer Exhaust Stack  Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack	NO <sub>x</sub>	1.90	8.31
			SO <sub>2</sub>	29.35	128.55
			PM <sub>10</sub>	2.62	11.46
			CO	11.34	49.65
			VOC	0.09	0.37
WHBLR 1	WHBLR 1	Waste Heat Recovery Boiler Natural Gas Burner Side	NO <sub>x</sub>	0.47	2.06
			SO <sub>2</sub>	0.01	0.04
			PM <sub>10</sub>	0.11	0.48
			CO	1.24	5.43
			VOC	0.08	0.35
CFL	CFL	Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters) with ESP as backup	PM <sub>10</sub>	0.63	2.76
			VOC	5.76	25.23
1-1	1-1	Line 1 Stabilizer Storage and Heater Baghouse Stk	PM <sub>10</sub>	0.23	1.01
1-3	1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM <sub>10</sub>	0.03	0.13

TCEQ-10153 [Revised 04/08] Table 1(a)

This form is for use by sources subject to air quality permit requirements and may be revised periodically. [APDG 5178 v5]



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

Date	7/1/2010	Permit No.:	7711A	Regulated Entity No.:	100788959
Area Name:	GAF Materials Corporation, Dallas Facility			Customer Reference No.:	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA					
1. Emission Point			2. Component of Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		Pounds per Hour (A)	TPY (B)
1-4	1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	PM <sub>10</sub>	0.59	2.58
1-5	1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	PM <sub>10</sub>	0.59	2.58
1-6	1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	PM <sub>10</sub>	0.59	2.58
COOL1 (total 3 stks)	COOL1 (total 3 stks)	Line 1 Cooling Section	PM <sub>10</sub>	8.52	37.30
			VOC	1.65	7.23
25	25	Sand Application Baghouse	PM <sub>10</sub>	1.50	6.57
26A	26A	Stabilizer Storage Baghouse A	PM <sub>10</sub>	0.15	0.70
26B	26B	Stabilizer Storage Baghouse B	PM <sub>10</sub>	0.29	1.26
27	27	Stabilizer Heater Baghouse	PM <sub>10</sub>	0.09	0.40
28	28	Asphalt Heater	NO <sub>x</sub>	0.59	2.60
			SO <sub>2</sub>	0.004	0.02
			PM <sub>10</sub>	0.04	0.20
			CO	0.50	2.20
			VOC	0.03	0.10
FUG1	FUG1	Plantwide Fugitive Emissions	PM <sub>10</sub>	0.91	3.97
			VOC	0.43	1.88

TCEQ-10153 [Revised 04/08] Table 1(a)

This form is for use by sources subject to air quality permit requirements and may be revised periodically. [APDG 5178 v5]

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## Table 1(a) Emission Point Summary

<b>Date</b>	7/1/2010	<b>Permit No.:</b>	7711A	<b>Regulated Entity No.:</b>	100788959
<b>Area Name:</b>	GAF Materials Corporation, Dallas Facility			<b>Customer Reference No.:</b>	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA					
1. Emission Point			2. Component of Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		Pounds per Hour (A)	TPY (B)
COOL3 (total 3 stks)	COOL3 (total 3 stks)	Line 3 Cooling Section	PM <sub>10</sub>	6.74	29.52
			VOC	2.76	12.09
HTR6	HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO <sub>x</sub>	0.60	2.58
			SO <sub>2</sub>	0.01	0.02
			PM <sub>10</sub>	0.05	0.20
			CO	0.49	2.16
			VOC	0.03	0.14

EPN = Emission Point Number

FIN = Facility Identification Number

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
**Table 1(a) Emission Point Summary**

Date	7/1/2010	Permit No.:	7711A	Regulated Entity No.:	100788959
Area Name:	GAF Materials Corporation, Dallas Facility			Customer Reference No.:	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA			EMISSION POINT DISCHARGE PARAMETERS										
1. Emission Point			4. UTM Coordinates of Emission Point			5. Building Height (Feet)	6. Height Above Ground (Feet)	7. Stack Exit Data			8. Fugitives		
(A) EPN	(B) FIN	(C) NAME	Zone	East (Meters)	North (Meters)			(A) Diameter (Feet)	(B) Velocity (fps)	(C) Temperature (°F)	(A) Length (F)	(B) Width (Ft)	(C) Axis Degrees
HTR3	HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	14	700,204	3,628,338		22.04	1.00	18.00	200			
HTR4	HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	14	700,204	3,628,334		22.04	1.00	18.00	200			
HTR5	HTR5	Asphalt Heater for T-14 and T-15 coating Asphalt Storage and Coating Feed Loop	14	700,217	3,628,331		29.68	2.00	30.00	570			
BLR5	BLR5	Stand-by Boiler Vent	14	700,217	3,628,372		31.79	2.04	50.00	1000			
8	TO1	Thermal Oxidizer Exhaust Stack	14	700,217	3,628,363		36.99	2.03	182.24	1460			
8A	8A	Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack	14	700,218	3,628,365		57	3.94	48.38	583			
WHBLR 1	WHBLR 1	Waste Heat Recovery Boiler Natural Gas Burner Side	14	700,218	3,628,366		57	2.00	14.73	410			
CFL	CFL	Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters) with ESP as backup	14	700,178	3,628,333		40.77	2.40	32.14	103			
1-1	1-1	Line 1 Stabilizer Storage and Heater Baghouse Stk	14	700,151	3,628,387		44.1	0.80	92.00	96			
1-3	1-3	Line 1 Stabilizer Use Bin Baghouse Stack	14	700,157	3,628,355		43.96	0.84	92.00	200			
1-4	1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	14	700,121	3,628,341		23.53	2.21	123.00	76			
1-5	1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	14	700,125	3,628,341		23.53	2.21	92.00	76			
1-6	1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	14	700,128	3,628,341		23.53	2.21	123.00	76			
COOL1 (total 3 stks)	COOL1 (total 3 stks)	Line 1 Cooling Section	14	700,143	3,628,349		64.27	5.00	32.00	84			
25	25	Sand Application Baghouse	14	700,190	3,628,305		61.23	3.90	65.00	100			
26A	26A	Stabilizer Storage Baghouse A	14	700,214	3,628,310		73.35	0.65	59.00	Ambient			
26B	26B	Stabilizer Storage Baghouse B	14	700,221	3,628,309		73.35	0.65	59.00	Ambient			
27	27	Stabilizer Heater Baghouse	14	700,190	3,628,315		37.08	1.32	35.00	200			
28	28	Asphalt Heater	14	700,242	3,628,344		68.63	2.00	30.00	700			
FUG1	FUG1	Plantwide Fugitive Emission:	14	700,160	3,628,400		--	--	--	--	1048.56	800.52	--
COOL3 (total 3 stks)	COOL3 (total 3 stks)	Line 3 Cooling Section	14	700,180	3,628,310		73	5.00	32.00	84			
HTR6	HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	14	700,152	3,628,368		39.13	3.00	30.00	700			

EPN = Emission Point Number

FIN = Facility Identification Number

TCEQ-10153 [Revised 04/08] Table 1(a)

This form is for use by sources subject to air quality permit requirements and may be revised periodically. [APDG 5178 v5]

**ATTACHMENT 2. GAF MODELED SOURCE PARAMETERS AND EMISSIONS FOR  
THE FULL IMPACT ANALYSIS**

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**GAF Modeled Source Locations and Parameters for the Full Impact Analysis**

EPN	Modeled Source ID	Modeled Source Type	Modeled Source Description	UTM Coordinates		Modeled Release		Source Parameters		Modeled Source		Modeled Source		Emission Rates	
				East (m)	North (m)	Height (ft)	(m)	Modeled Source Temperature (F)	(K)	Modeled Source Velocity (fps)	(m/s)	Modeled Source Diameter (ft)	(m)	Hourly (lb/hr)	Annual (tpy)
28	28	POINT	Asphalt Heater	700,242	3,628,344	69	20.92	700	644.26	30	9.14	2.00	0.61	0.59	2.60
8	8	POINT	Thermal Oxidizer Exhaust Stack	700,217	3,628,363	37	11.27	1,460	1066.48	182	55.55	2.03	0.62	1.90	8.31
8A	8A	POINT	Thermal Oxidizer Exhaust thru Waste Heat Boiler	700,218	3,628,365	57	17.37	583	579.26	48	14.75	3.94	1.2	1.90	8.31
WHBLR 1	WHBLR 1	POINT	Waste Heat Recovery Boiler Natural Gas Burner	700,218	3,628,366	57	17.37	410	483.15	15	4.49	2.00	0.61	0.47	2.06
HTR1	HTR1	POINT	Heatec	700,144	3,628,391	17	5.29	469	515.93	21	6.33	2.00	0.61	0.37	1.62
HTR3	HTR3	POINT	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	700,204	3,628,338	22	6.72	200	366.48	18	5.49	1.00	0.3	0.05	0.22
HTR4	HTR4	POINT	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	700,204	3,628,334	22	6.72	200	366.48	18	5.49	1.00	0.3	0.05	0.22
HTR5	HTR5	POINT	Asphalt Heater for T-14 and T-15 coating Asphalt	700,217	3,628,331	30	9.05	570	572.04	30	9.14	2.00	0.61	0.10	0.43
HTR6	HTR6	POINT	Line 3 Stabilizer Thermal Fluid Heater Vent	700,152	3,628,368	39	11.93	700	644.26	30	9.14	3.00	0.91	0.60	2.58
HTR7	HTR7	POINT	Asphalt flux heater	700,238	3,628,347	57	17.37	475	519.26	13	4.06	1.50	0.46	0.46	2.00
HTR8	HTR8	POINT	Filled coating heat exchanger heater	700,199	3,628,341	57	17.37	475	519.26	13	4.06	1.50	0.46	0.46	2.00

### ATTACHMENT 3. INVENTORY SOURCE UPDATES AND SUPPORTING DOCUMENTATION

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This section outlines the changes made to the TCEQ PSDB Inventory Retrieval for the American Airlines and DSI Transport facilities as noted within Section 1.3 of this letter.

- **American Airlines Inc [AA] (TCEQ Account No. TA2566T):** Per the TCEQ PSDB, the American Airlines sources are authorized via Permit No. 22299. However, Permit No. 22299 corresponds to "Sealed Air Corporation", not "American Airlines Inc." In addition, the hourly emission rates for four (4) emission sources noted under the AA data block in the PSDB are extremely high. The PSDB files ("*psdb\_NOX\_S\_latha1.txt*" and "*psdb\_NOX\_L\_latha2.txt*") provided by the TCEQ are provided in the electronic submittals. As can be seen from "*psdb\_NOX\_S\_latha1.txt*", the hourly emission rates for Source ID Numbers 12310, 12320, 12500, and 12520 are between one and six (1 - 6) tons per hour (tph) of NO<sub>x</sub>. The annual emission rates for these sources would only account for a few hours of operation in any single year. Based on these two items, additional research was conducted on the Sealed Air Corporation and American Airlines sources as noted below.
  - ***Sealed Air Corporation:*** Per TCEQ records available on-line and the hard copy files obtained from the TCEQ's Austin office, there is only one NO<sub>x</sub> emission source at Sealed Air Corporation (i.e. *EPN OX-1*) authorized via Permit No. 22299 and there are no registered PBRs. This source is included in the PSDB retrieval under the record for Sealed Air Corporation (Account No. TA2554D). As such, no change is proposed for this source.
  - ***American Airlines:*** Per TCEQ's records available on-line, the sources located at this American Airlines facility are authorized under Permit By Rules (PBRs) only. Therefore, in addition to the Technical Review documents available on TCEQ's Remote Server, hard copy PBR Registration documents were obtained from the TCEQ's Austin office. Using these documents, the following was noted:
    - The 4 emission sources (Source ID Numbers: 12310, 12320, 12500, and 12520) with very high hourly emission rates were not included in the hard copy files obtained from the TCEQ's Austin office.
    - Based on the summary of site-wide emissions included in the registration documents for American Airlines, the total hourly emission rates for this facility are 227.36 lb/hr, which is nearly equivalent to the total hourly emission rates from all of the emission sources listed in the PSDB for American Airlines minus the 4 significant sources (230.75 lb/hr). Copies of the PBR registration application documents that include the emission sources and the emissions summary tables showing site-wide emissions (obtained from the TCEQ's Austin's office) are provided in this attachment. The PSDB files appear incorrect, because the sources represented by the Source ID Numbers should

appear in corresponding TCEQ file documentation such as permit applications and permits.

Therefore, these 4 emission sources (Source ID Numbers 12310, 12320, 12500, and 12520) were removed from the inventory sources for American Airlines and all other sources included in the PSDB for this site were modeled with no additional changes.

- **DSI Transport Inc (TCEQ Account No. DB3234W, Permit No. 24954):** Per the TCEQ Central Registry, Permit No. 24954 is cancelled. In addition, per the permitting history for this facility, this facility is no longer in operation (Project No. 108618). Therefore, Source ID numbers 6890 and 6900 were deleted from the inventory sources. The Central Registry Query and the summary of Project No. 108618 are provided in this attachment.

**Emissions Summary Documents for American Airlines Inc.  
(TCEQ Account No. TA2566T)**





## BOILERS

As briefly mentioned in the discussion on space heaters, boilers are used at the AA maintenance facility and the terminal operations facility to supply winter-month heating for the following buildings:

- Hangar I - II (Maintenance Facility);
- Hangar III-IV (Maintenance Facility); and
- 2W Automotive building (Terminal Operations Facility).

The location of these boilers can be seen on the plots in Attachments II.A Nos. 1, 2 and 5). As stated earlier these boilers are operated only during winter months or approximately 2,000 hours per year.

The Hangar I - II central utility plant boilers (i.e. three 14.63 MMBtu/hr units constructed 1972) and the Hangar III - IV central utility plant boilers (i.e. three 31.3 MMBtu/hr units constructed 1991) will only fire natural gas. Fuel oil will not be used as backup. The boilers are authorized under Standard Exemption No. 7. The Hangar I - II and Hangar III - IV boilers meet the requirements of Standard Exemption No. 7 as follows:

- maximum heat input rating is less than 40.0 Mmbtu/hr.

The 2.5 MMBtu/hr boiler in the 2W Automotive building meets all the requirements of the latest version of 30 TAC §106.183. Since it can fire only natural gas and the maximum heat input rating is less than 10.0 MMBtu/hr, NO<sub>x</sub> control technology is not required.

## STORAGE TANKS

The AA maintenance and terminal operations facilities have a number of storage tanks which contain a variety of liquids. The majority of these storage tanks are located within the Terminal operations facility. The liquids contained in the storage tanks are as follows:

- gasoline;





## INCINERATORS

Emissions for each of the AA Terminal Operations Facility incinerators were quantified using emission factors from AP-42, 5th Edition, Supplement E, Section 2.1-12. The emission rate calculations were also based on the amount of waste burned per day [assumed 100 lbs], and an operating schedule of 365 days per year. Short term and annual emission calculations are presented in Appendix V.A.1 - Table 5. The emissions presented in the table represent emissions from one incinerator.

## SPACE HEATERS AND PRESSURE WASHERS

Emissions for each of the natural gas-fired heaters (i.e. ceiling heating units and the two pressure washer heaters) at both AA facilities were quantified using emission factors from AP-42, 5th Edition, Supplement E, Section 1.4. The emission rate calculations were also based on unit firing rates [MMBtu/hr], an assumed natural gas fuel heating value of 1,020 Btu/scf, and an operating schedule commensurate with heater maintenance and service requirements. Short term and annual emission calculations are presented in Appendix V.A.1 - Table 6a [Maintenance Facility] and Table 6b [Terminal Operations Facility].

## BOILERS

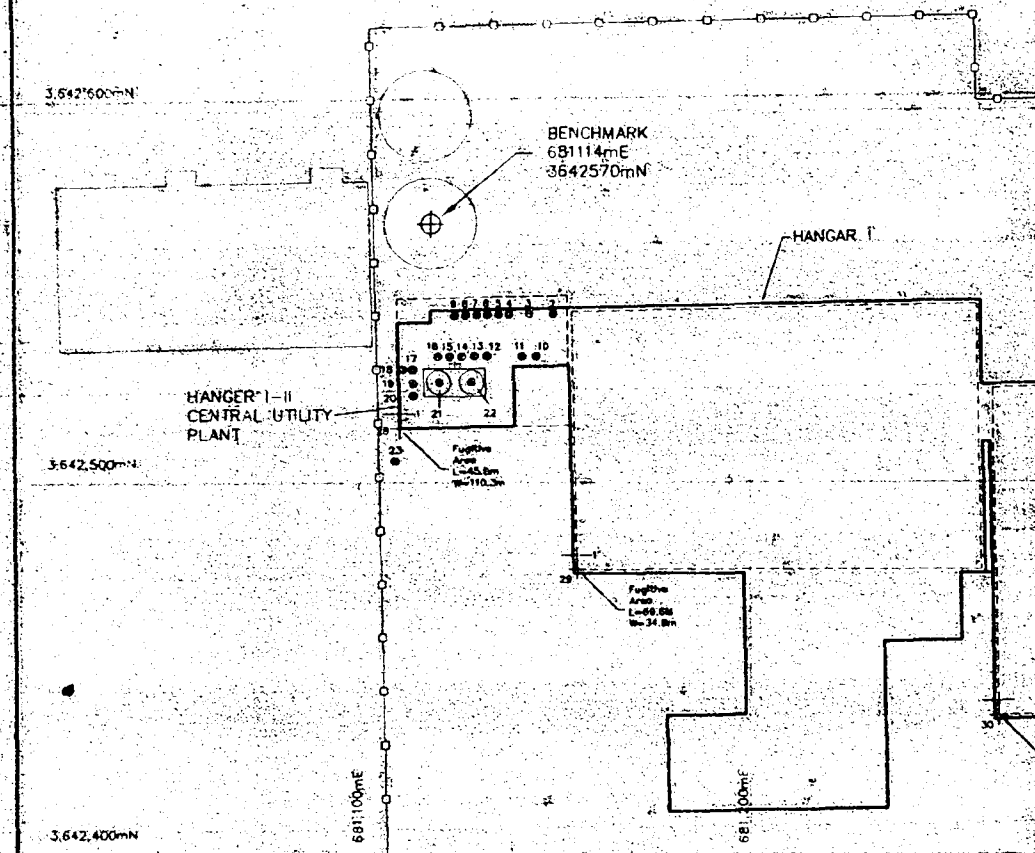
Emissions for each of the natural gas-fired boilers at AA Maintenance facility and the AA Terminal Operations Facility were quantified using emission factors from AP-42, 5th Edition, Supplement E, Section 1.4, Tables 1.4-1 and 1.4-2. The emission rate calculations were also based on unit firing rates [MMBtu/hr], an assumed natural gas fuel heating value of 1,020 Btu/scf, and an operating schedule commensurate with winter-month building heating requirements and maintenance/service requirements. Short term and annual emission calculations are presented in Appendix V.A.1 - Table 7a [Maintenance Facility] and 7b [Terminal Operations Facility].

## STORAGE TANKS

Emissions for each storage tank at both the Maintenance and Terminal Operations facilities were estimated using the emission factors from AP-42, 5th Edition, Supplement E, Section 5.2, Table 5.2-7 and USEPA Storage Tank Emissions Calculation Software, Version 4.07. The gasoline storage tank emissions were based on the emission factors taken from the AP-42



# POOR QUALITY ORIGINAL



PLOT ID	EPN	EPN DESCRIPTION	UTM'S (m)	PLOT ID	EPN	EPN DESCRIPTION
			(Easting) (Northing)			
1	H2O/L1	6,000 gal. used oil tank (UST)	681443.1 3642484.6	28	CUP1FUG	CUP1 Fugitive Area
2	CUP1FUG	Parts Washer	681146.9 3642545.5	29	H1FUG	Hanger 1 Fugitive Area
3	CUP1FUG	15,000 gal. Foam tank	681140.3 3642545.5	30	H2FUG	Hanger 2 Fugitive Area
4	CUP1FUG	Diesel Day tank	681134.8 3642545.3			
5	CUP1FUG	Diesel Day tank	681131.8 3642545.2			
6	CUP1FUG	Diesel Day tank	681128.9 3642545.2			
7	CUP1FUG	Diesel Day tank	681126.0 3642545.1			
8	CUP1FUG	Diesel Day tank	681123.0 3642545.0			
9	CUP1FUG	Diesel Day tank	681120.1 3642545.0			
10	CUP1FOAM1	Foam Pump No.1	681142.2 3642534.0			
11	CUP1FOAM2	Foam Pump No.2	681136.4 3642534.0			
12	CUP1FIRE1	Firepump No.1	681128.8 3642534.0			
13	CUP1FIRE2	Firepump No.2	681125.4 3642534.0			
14	CUP1FIRE3	Firepump No.3	681122.1 3642534.0			
15	CUP1FIRE4	Firepump No.4	681118.9 3642534.0			
16	CUP1FIRE5	Firepump No.5	681115.8 3642534.0			
17	CUP1BLR1	Boiler No.1	681109.1 3642530.5			
18	CUP1FUG	Diesel Day tank	681106.6 3642530.5			
19	CUP1BLR2	Boiler No.2	681109.1 3642526.8			
20	CUP1BLR3	Boiler No.3	681109.1 3642523.4			
21	CUP1COOL1	Cooling Tower No.1	681116.0 3642527.0			
22	CUP1COOL2	Cooling Tower No.2	681124.6 3642527.0			
23	CUP1DE	10,000 gal. Diesel tank (UST)	681104.4 3642505.8			



POOR QUALITY ORIGINAL

APPENDIX V.A.3 - SITE-WIDE

AMERICAN AIR  
DFW INTERNATIONAL

MAINTENANCE FACILITY

EMISSION SOURCE GROUP	Short-Term Emission Rates (lb/hr)					
	NOx	CO	VOC	NON-VOC	SO2	PM
ENGINES	192.480	41.460	15.480	0.000	15.160	13.820
HANGAR III-IV FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
WELDING	0.000	0.000	0.000	0.000	0.000	0.000
PARTS WASHERS	0.000	0.000	0.030	0.000	0.000	0.000
SURFACE COATING	0.000	0.000	5.600	0.000	0.000	1.330
WIPE SOLVENT CLEANING	0.000	0.000	2.040	0.000	0.000	0.000
HANGAR III-IV VEHICLE SURFACE COATING	0.000	0.000	0.430	0.010	0.000	0.000
SPACE HEATERS	0.860	0.360	0.100	0.000	0.010	0.070
BOILERS	13.510	11.350	1.490	0.000	1.030	0.080
WEST WAREHOUSE FUEL STATION No. 1	0.000	0.000	0.018	0.000	0.000	0.000
WEST WAREHOUSE FUEL STATION No. 2	0.000	0.000	0.190	0.000	0.000	0.000
STORAGE TANKS	0.000	0.000	0.190	0.000	0.000	0.000
TOTAL	207.85	53.17	25.73	0.01	16.20	15.30

TERMINAL OPERATIONS FACILITY

EMISSION SOURCE GROUP	Short-Term Emission Rates (lb/hr)					
	NOx	CO	VOC	NON-VOC	SO2	PM
ENGINES	17.590	3.770	1.410	0.000	1.380	1.260
WELDING	0.000	0.000	0.000	0.000	0.000	0.000
PARTS WASHERS	0.000	0.000	0.320	0.000	0.000	0.000
SE HOLD PAD FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
SW HOLD PAD FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
SPACE HEATERS & WASHERS	1.650	1.170	0.180	0.000	0.010	0.130
1E TRUCK MAINTENANCE VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
2W AUTOMOTIVE VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
GATE 2 VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
GENERATORS	0.054	0.187	0.054	0.000	0.046	0.125
BOILER	0.220	0.180	0.020	0.000	0.001	0.020
STORAGE TANKS	0.000	0.000	0.320	0.000	0.000	0.000
TOTAL	19.51	5.31	12.19	0.03	1.44	1.54



POOR QUALITY ORIGINAL

ATTACHMENT V.A. - TABLE 5



AMERICAN AIRLINES, INC. - TERMINAL OPERATIONS FACILITY  
DFW INTERNATIONAL AIRPORT

SMALL INDUSTRIAL/COMMERICAL MULTIPLE CHAMBER INCINERATOR EMISSION CALCULATIONS\*

EPNS: 2E-3EINC1 and 2E-3EINC2

CRITERIA POLLUTANT	AP-42 TABLE 2.1-12 EMISSION FACTORS <sup>1</sup> lb/lb (lb/day)	WASTE FIRED lb (lb/day)	WASTE FIRED ton/day	WASTE FIRED ton/day	HOURLY ACTUAL EMISSION RATE (ton/hr) 2000/2000	ANNUAL ACTUAL EMISSION RATE (ton/yr) 2000/2000
PM	7.0	100	0.05	18.25	0.064	0.064
SO <sub>2</sub>	2.5	100	0.05	18.25	0.023	0.023
CO	10.0	100	0.05	18.25	0.091	0.091
TOC <sup>2</sup>	3.0	100	0.05	18.25	0.027	0.027
NO <sub>x</sub>	3.0	100	0.05	18.25	0.027	0.027

Notes:

- \* These calculations represent emissions from one incinerator.
- <sup>1</sup> AP-42, 5<sup>th</sup> Edition, Supplement E, Table 2.1-12.
- <sup>2</sup> Annual emission estimations assume 365 days of operation.
- <sup>3</sup> Expressed as methane.

**Permitting Status Documents for DSI Transport Inc.  
(TCEQ Account No. DB3234W)**

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## Central Registry Query - Regulated Entity Information

### Regulated Entity Information

**RN Number:** RN102518396**Name:** DSI TRANSPORT INC**Primary Business:** TRUCK WASHING FACILITY**Street Address:** No street address on file.**County:** DALLAS**Nearest City:** DALLAS**State:** TX**Near ZIP Code:** 75011**Physical Location:** 3151 HALIFAX

### Affiliated Customers - Current

Your Search Returned **1** Current Affiliation Records (View Affiliation History)**1-1 of 1 Records**

CN Number	Customer Name	Customer Role	Details
CN600404628	TRIMAC TRANSPORTATION SOUTH INC	OWNER	

### Industry Type Codes

Code	Classification	Name	Primary
4231	SIC	Terminal and Joint Terminal Maintenance Facilities for Motor Freight	Yes

### Permits, Registrations, or Other Authorizations

There are a total of **2** programs and IDs for this regulated entity. Click on a column name to change the sort order.**1-2 of 2 Records**

Program▲	ID Type	ID Number	ID Status
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	DB3234W	ACTIVE
AIR NEW SOURCE PERMITS	PERMIT	24954	CANCELLED

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Last Modified 12/4/08

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Go To: Title V Federal Operating Permits

[Online Help](#)[Search Again](#)

Last Updated Date : 06/16/2010

**Air Permitting Actions for:**

account: DB3234W

program area: NSR

project status: ALL

order by: proj\_id

Click on the Project Number to see details about that permit application.

Program Area	Permit Number	Permit Type	Permit Status	Project Number	Company Name	Customer Number	Project type	TCEQ Received Date	Project Complete Date	Renewal Date	Project Status	Project Name	Regulated Entity	Physical Location	Region Name
NSR	24954	CONSTRUCT	VOID	27366	DSI TRANSPORTS INC	CN600404628	INITIAL	05/03/94	05/02/95	05/02/05	COMPLETE	TANK SEMITRAILER CLEANING FAC.	RN102518396	3151 HALIFAX	REGIO - DFW METRC
NSR	24954	CONSTRUCT	VOID	46255	DSI TRANSPORTS INC	CN600404628	STARTCONST	09/13/96	10/03/96	05/02/05	COMPLETE	TANK SEMITRAILER CLEANING FAC.	RN102518396	3151 HALIFAX	REGIO - DFW METRC
NSR	24954	CONSTRUCT	VOID	108618	DSI TRANSPORTS INC	CN600404628	VOIDPMT	06/07/04	08/02/04	05/02/05	COMPLETE	FACILITY NO LONGER IN OPERATION	RN102518396	3151 HALIFAX	REGIO - DFW METRC

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Last Modified 2/6/10

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Go To: Title V Federal Operating Permits  
06/16/2010 -----AirPermits IMS - PROJECT RECORD -----

Company Name: **DSI TRANSPORTS INC**  
Central Registry Id : **CN600404628**

Region: **DFW METROPLEX** Account: **DB3234W** Central Registry Id: **RN102518396**  
County Name: **DALLAS** City: **DALLAS**  
Location : **3151 HALIFAX**

**PROJECT INFORMATION**

Project Administrative Name: **FACILITY NO LONGER IN OPERATION**  
Project Technical Name: **FACILITY NO LONGER IN OPERATION**

Project Number: **108618** Permit Number: **24954** Std/Pbr Number:  
Project Received Date: **06/07/2004** Renewal Date: **05/02/2005** Issued Date: **08/02/2004**

Project Type: **VOIDPMT** Permit Type: **CONSTRUCTION**  
Project Status: **COMPLETE**

Assigned Staff:  
**REVIEWR1\_2: MALARCHER , LOUIS**  
Staff Group:  
**OPERATIONAL SUPPORT**

**FEE**

Reference	Fee Receipt Number	Amount	Fee Receipt Date	Fee Payment Type
-----------	--------------------	--------	------------------	------------------

**TRACKING ELEMENTS**

TE Name	Start Date	Complete Date
<b>CENTRAL REGISTRY UPDATED</b>	<b>08/02/2004</b>	
<b>APIRT RECEIVED PROJECT (DATE)</b>	<b>06/07/2004</b>	

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**ATTACHMENT 4. ELECTRONIC FILES**

---

**From:** Melissa Schmidt  
**To:** Erin Selvera; Javier Galvan; Vic McWherter  
**CC:** Bridget C. Bohac; Deanna Avalos  
**Date:** 6/28/2010 9:41 AM  
**Subject:** 2ND REQUEST: Direct Referral - Building Materials Corporation of America; 2010-0896-AIR  
**Attachments:** Building Materials NOH.doc

The attached is the draft notice for the case listed above. Please review and send your comments/approval by the close of business Friday, June 25, 2010.

Provide dates of availability on or after August 9, 2010.

Please provide a location for hearing, if other than Austin.

Please provide an estimate of how many people from all parties plan to attend this hearing.

This case will not be docketed with SOAH nor mailed without the approval of legal.

Thanks

**NOTICE OF HEARING**  
**BUILDING MATERIALS CORPORATION OF AMERICA**  
**SOAH Docket No. \_\_\_\_\_**  
**TCEQ Docket No. 2010-0896-AIR**  
**Proposed Permit No. 7711A**

**APPLICATION.** Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. The facility will emit the following air contaminants: particulate matter including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides.

The TCEQ executive director has prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Fort Worth Regional Office, and at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the Texas Commission on Environmental Quality Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

**DIRECT REFERRAL.** The Notice of Application and Preliminary Decision was published on March 11, 2010. On June 2, 2010, the Applicant filed a request for direct referral to the State Office of Administrative Hearings (SOAH). Therefore, the chief clerk has referred this application directly to SOAH for a hearing on whether the application complies with all applicable statutory and regulatory requirements.

**CONTESTED CASE HEARING.** The State Office of Administrative Hearings (SOAH) will conduct a formal contested case hearing at:

**DATE:**  
**TIME:**  
**LOCATION:**

The contested case hearing will be a legal proceeding similar to a civil trial in state district court. The hearing will be conducted in accordance with the Chapter 2001, Texas Government Code; Chapter 382, Texas Health and Safety Code; TCEQ rules including 30 Texas Administrative Code

(TAC) Chapter 116, Subchapters A and B; and the procedural rules of the TCEQ and SOAH, including 30 TAC Chapter 80 and 1 TAC Chapter 155.

To request to be a party, you must attend the hearing and show you would be affected by the application in a way not common to the general public. Any person may attend the hearing and request to be a party. Only persons named as parties may participate at the hearing.

**INFORMATION.** If you need more information about the hearing process for this application, please call the Office of Public Assistance, Toll Free, at 1-800-687-4040. General information regarding the TCEQ can be found at [www.TCEQ.state.tx.us](http://www.TCEQ.state.tx.us).

Persons with disabilities who need special accommodations at the hearing should call the SOAH Docketing Department at 512-475-3445, at least one week prior to the hearing.

Further information may also be obtained from Building Materials Corporation of America at the address stated above or by calling Mr. Doug Harris, Plant Engineer, at 214-637-8909.

Issued:

---

LaDonna Castañuela, Chief Clerk  
Texas Commission on Environmental Quality

**Javier Galvan - Re: Fw: GAF - NSR Permit No. 7711A - Status of NO2 1-hr Modeling Project**

---

**From:** Daniel Menendez  
**To:** Jamieson, Daniel  
**Date:** 6/25/2010 10:40 AM  
**Subject:** Re: Fw: GAF - NSR Permit No. 7711A - Status of NO2 1-hr Modeling Project  
**CC:** Galvan, Javier

---

Dan,

FYI...

I called Latha and talked to her about her approach to adjusting her inventory sources. I basically told her that whatever adjustments are made need to be justified and all supporting documentation will need to be included in the modeling report.

Daniel

>>> Latha Kambham <LKambham@trinityconsultants.com> 6/24/2010 4:16 PM >>>  
Mr. Menendez,

The GAF Dallas Plant is conducting NO2 1-hr NAAQS Analysis as part the NSR Permit Amendment project. Per Mr. Daniel Jamieson's request, a modeling approach memo was submitted to the TCEQ on May 19th. The details of the modeling approach were discussed with Mr. Jamieson during a conference call on May 20th. Additional guidance was obtained via emails.

As included in the email below, an update on the modeling project status was provided to Mr. Javier Galvan and Mr. Jamieson yesterday. Based on the preliminary analysis, GAF initiated Full Impact Analysis with Inventory Modeling. The details of the modeling approach are provided in the email below. As part of this analysis, GAF proposes to modify the off-property inventory source data. The specific modifications are also noted in the email below. Therefore, GAF requested Mr. Jamieson to review and provide any comments on the proposed modeling approach.

However, Mr. Jamieson is out of the office until June 29th. As Mr. Galvan may have mentioned, GAF is under an Agreed Order deadline to obtain the NSR Permit. GAF would like to complete the modeling analysis and submit the results to the TCEQ next week. Therefore, we would appreciate it if you could review the proposed modeling approach and provide your comments as soon as possible.

Please feel free to call me at (972) 661-8100, if you need additional details.

Thanks  
Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
12770 Merit Drive, Suite 900  
Dallas, TX 75251  
Tel: 972-661-8100  
Fax: 972-385-9203

**Javier Galvan - Fw: GAF - NSR Permit No. 7711A - Status of NO2 1-hr Modeling Project**

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** <dmenende@tceq.state.tx.us>  
**Date:** 6/24/2010 4:18 PM  
**Subject:** Fw: GAF - NSR Permit No. 7711A - Status of NO2 1-hr Modeling Project  
**CC:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>, <JGalvan@tceq.state.tx.us>, <dharris@gaf.com>, Christine Chambers <CChambers@trinityconsultants.com>, Latha Kambham <LKambham@trinityconsultants.com>  
**Attachments:** American Airline Inc\_Annual Emissions from PSDB.txt; American Airline Inc\_Short Term Emissions from PSDB.txt; psdb\_NOX\_L\_latha2.txt; psdb\_NOX\_S\_latha1.txt; American Airlines Inc\_Site-Wide Emission.pdf; DSI Transport Inc\_Central Registry Query.pdf; DSI Transport Inc\_Project No. 108618..pdf

Mr. Menendez,

The GAF Dallas Plant is conducting NO2 1-hr NAAQS Analysis as part the NSR Permit Amendment project. Per Mr. Daniel Jamieson's request, a modeling approach memo was submitted to the TCEQ on May 19th. The details of the modeling approach were discussed with Mr. Jamieson during a conference call on May 20th. Additional guidance was obtained via emails.

As included in the email below, an update on the modeling project status was provided to Mr. Javier Galvan and Mr. Jamieson yesterday. Based on the preliminary analysis, GAF initiated Full Impact Analysis with Inventory Modeling. The details of the modeling approach are provided in the email below. As part of this analysis, GAF proposes to modify the off-property inventory source data. The specific modifications are also noted in the email below. Therefore, GAF requested Mr. Jamieson to review and provide any comments on the proposed modeling approach.

However, Mr. Jamieson is out of the office until June 29th. As Mr. Galvan may have mentioned, GAF is under an Agreed Order deadline to obtain the NSR Permit. GAF would like to complete the modeling analysis and submit the results to the TCEQ next week. Therefore, we would appreciate it if you could review the proposed modeling approach and provide your comments as soon as possible.

Please feel free to call me at (972) 661-8100, if you need additional details.

Thanks  
 Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
 Consultant

Trinity Consultants  
 12770 Merit Drive, Suite 900  
 Dallas, TX 75251  
 Tel: 972-661-8100  
 Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)

\*\*\*\*\*

----- Forwarded by Latha Kambham/Trinity Consultants on 06/24/2010 03:58 PM -----

From: Latha Kambham/Trinity Consultants

**Javier Galvan - Re: Fwd: Direct Referral: Building Materials Corporation of America; 2010-0896-AIR**

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 6/24/2010 10:22 AM  
**Subject:** Re: Fwd: Direct Referral: Building Materials Corporation of America; 2010-0896-AIR

---

You probably will not need to attend the preliminary hearing. If you have comments on the notice, send them to me and I'll combine them with mine for Melissa.

>>> Javier Galvan 6/24/2010 10:15 AM >>>  
Erin,

I wanted to ask two questions: (1) Do you/will you need me to attend this meeting?; and (2) Do you need me to provide any comments on the document provided by Ms. Schmidt?

Thanks.

Javier

>>> Melissa Schmidt 6/23/2010 9:58 AM >>>

The attached is the draft notice for the case listed above. Please review and send your comments/approval by the close of business **Friday, June 25, 2010.**

Provide dates of availability on or after **August 9, 2010.**

Please provide a location for hearing, if other than Austin.

Please provide an estimate of how many people from all parties plan to attend this hearing.

**This case will not be docketed with SOAH nor mailed without the approval of legal.**

Thanks



**Javier Galvan - Fwd: Direct Referral: Building Materials Corporation of America; 2010-0896-AIR**

---

**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 6/24/2010 10:15 AM  
**Subject:** Fwd: Direct Referral: Building Materials Corporation of America; 2010-0896-AIR  
**Attachments:** Building Materials NOH.doc

---

Erin,

I wanted to ask two questions: (1) Do you/will you need me to attend this meeting?; and (2) Do you need me to provide any comments on the document provided by Ms. Schmidt?

Thanks.

Javier

>>> Melissa Schmidt 6/23/2010 9:58 AM >>>

The attached is the draft notice for the case listed above. Please review and send your comments/approval by the close of business **Friday, June 25, 2010.**

Provide dates of availability on or after **August 9, 2010.**

Please provide a location for hearing, if other than Austin.

Please provide an estimate of how many people from all parties plan to attend this hearing.

**This case will not be docketed with SOAH nor mailed without the approval of legal.**

Thanks

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Javier Galvan" <JGalvan@tceq.state.tx.us>, "Daniel Jamieson" <DJamieso@...>  
**CC:** "Harris, Doug" <dharris@gaf.com>, Christine Chambers <CChambers@trinityc...>  
**Date:** 6/23/2010 2:09 PM  
**Subject:** Re: GAF - NSR Permit No. 7711A - Status of NO2 1-hr Modeling Project  
**Attachments:** American Airline Inc\_Annual Emissions from PSDB.txt; American Airline Inc\_Short Term Emissions from PSDB.txt; psdb\_NOX\_L\_latha2.txt; psdb\_NOX\_S\_latha1.txt; American Airlines Inc\_Site-Wide Emission.pdf; DSI Transport Inc\_Central Registry Query.pdf; DSI Transport Inc\_Project No. 108618..pdf

Javier and Daniel,

Per the conference call with TCEQ on May 20, 2010, and subsequent guidance received via emails from the TCEQ, GAF is conducting a NO2 1-hour State NAAQS modeling analysis. An update on the status of the modeling project is provided below:

**Step 1: Significance Analysis**

The Significance Analysis was conducted considering the emissions increases associated with the proposed project only to determine whether the project increases will have a significant impact upon the surrounding area. Based on the modeling results, the GLCmax from the NO2 Significance Analysis is greater than the applicable MSL (10 mg/m3). Therefore, a Full Impact Analysis was initiated.

**Step 2: Full Impact Analysis – Screening Analysis**

During the conference call with TCEQ, a Full Impact Analysis - Screening Analysis was discussed where the screening background concentration would be added to the results of the Significance Analysis and compared to 90% of the NAAQS. GAF is not pursuing the use of this approach based on the Significance Modeling and background concentrations available from the closest monitor. As such, a Full Impact Analysis was initiated.

**Step 3: Full Impact Analysis – Inventory Modeling**

The below section outlines the methodology GAF is pursuing for the Full Impact Analysis. Based on the modeling simulations conducted thus far, GAF should be submitting the final modeling results and modeling results memo early next week. If TCEQ has any comments to the below methodology, GAF respectfully requests comments as soon as possible.

**On-Property NOx Emission Sources:** Site-wide NOx emission sources at the GAF Dallas Plant will be modeled at their proposed potential to emit (PTE), except Emission Point Number (EPN) BLR5 (Standby Boiler). This is a standby boiler, authorized to operate 500 hours per year. This boiler will only be operated when the Thermal Oxidizer and the Waste Heat Boiler units are shut down. Therefore, EPN BLR5 is not included in the modeling analysis.

**Inventory Data:** The current inventory of maximum allowable emission rates for industrial sources within the radius of impact (ROI) were obtained from the TCEQ Point Source Data Base (PSDB) for use in the State NAAQS analysis. Per recent guidance received from the TCEQ, the "primary search" option was selected to obtain the PSDB. Therefore, off-property sources located within 50 km from the ROI will be included in the inventory modeling. Please note the section outlined below regarding the review and modifications to the inventory sources.

**NOx to NO2 Conversion:** Per the Ambient Ratio Method, the NOx emissions from the GAF Dallas Plant and the PSDB sources will be multiplied by 0.75 to convert to NO2 emission rates for air dispersion modeling purposes.

**Meteorological Data:** Inventory modeling will be conducted with 5 years of meteorological data. The meteorological data will be obtained from the TCEQ's website for years 1985, 1987, 1988, 1989, and 1990.

**Modeling Results:** The average H8H concentration among the five years of modeled data will be summed with the background concentration for the NAAQS compliance demonstration with the NO2 1-hour NAAQS (188 mg/m3).

**Review and Modification to Off-Property Inventory Sources Data:**

A Source Contribution analysis was performed using the preliminary inventory modeling results to determine the major off-property sources.

The largest off-property contributors were reviewed to determine if the PSDB data for these sources was representative. As a part of this review, GAF identified discrepancies in the PSDB retrieval and as such, proposes to update the modeling based on the following for "Americans Airlines Inc" and "DSI Transport Inc" facilities. These items were discussed with Mr. Robert Organ on June 16, 2010. He relayed he would discuss these items

with the TCEQ Emissions Inventory Group to ensure the PSDB was updated accordingly. Trinity contacted the Emissions Inventory group and left voice mails, but did not receive a response as of June 22, 2010. American Airlines Inc [AA] (TCEQ Account No. TA2566T): Per the PSDB provided by the TCEQ for American Airlines, the sources are authorized via Permit No. 22299. However, Permit No. 22299 corresponds to "Sealed Air Corporation", not "American Airlines Inc." In addition, the hourly emission rates for four (4) emission sources noted under the AA data block in the PSDB are extremely high. For your reference, the PSDB files ("psdb\_NOX\_S\_latha1.txt" and "psdb\_NOX\_L\_latha2.txt") provided by the TCEQ are attached with this email. As can be seen from "psdb\_NOX\_S\_latha1.txt", the hourly emission rates for Source ID Numbers 12310, 12320, 12500, and 12520 are between one and six (1 - 6) tons per hour (tph) of NOx. The annual emission rates for these sources would only account for a few hours of operation in any single year. The hourly and annual emission rates for this American Airlines facility, extracted from the PSDB files, are provided as separate attachments for a quick review. Based on these two items, additional research was conducted on the Sealed Air Corporation and American Airlines sources as noted below.

**Sealed Air Corporation:** Per TCEQ records available on-line and the hard copy files obtained from the TCEQ's Austin office, there is only one NOx emission source at Sealed Air Corporation (i.e. EPN OX-1) authorized via Permit No. 22299 and there are no registered PBRs. This source is included in the PSDB retrieval under the record for Sealed Air Corporation (Account No. TA2554D). As such, no change is proposed for this source. **American Airlines:** Per TCEQ's records available on-line, the sources located at this American Airlines facility are authorized under Permit By Rules (PBRs) only. Therefore, in addition to the Technical Review documents available on TCEQ's Remote Server, hard copy PBR Registration documents were obtained from the TCEQ's Austin office. Using these documents, the following was noted:

The 4 emission sources (Source ID Numbers: 12310, 12320, 12500, and 12520) with very high hourly emission rates were not included in the hard copy files obtained from the TCEQ's Austin office.

Based on the summary of site-wide emissions included in the registration documents for American Airlines, the total hourly emission rates for this facility are 227.36 lb/hr, which almost equals the total hourly emission rates from all of the emission sources listed in the PSDB for American Airlines minus the 4 significant sources (230.75 lb/hr). A scanned copy of the emissions summary tables showing site-wide emissions (obtained from the TCEQ's Austin's office) is attached for your reference.

Therefore, GAF proposes to remove the 4 emission sources (Source ID Numbers 12310, 12320, 12500, and 12520) from the inventory sources for American Airlines and model all other sources included in the PSDB for this site with no additional changes.

**DSI Transport Inc** (TCEQ Account No. DB3234W, Permit No. 24954): Per the TCEQ Central Registry, Permit No. 24954 is cancelled. In addition, per the permitting history for this facility, this facility is no longer in operation (Project No. 108618). Therefore, Source ID numbers 6890 and 6900 will be deleted from the inventory sources. The Central Registry Query and the summary of Project No. 108618 are attached for your reference.

GAF respectfully requests TCEQ's confirmation of the proposed approach for the inventory sources as soon as possible. If you need additional information, please feel free to call me at (972) 661-8100.

Thanks  
Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
12770 Merit Drive, Suite 900  
Dallas, TX 75251  
Tel: 972-661-8100  
Fax: 972-385-9203  
www.trinityconsultants.com  
\*\*\*\*\*

From:  
"Javier Galvan" <JGalvan@tceq.state.tx.us>  
To:  
"Latha Kambham" <LKambham@trinityconsultants.com>  
Date:  
06/22/2010 11:17 AM  
Subject:  
GAF - NSR Permit No. 7711A

Latha,

I wanted to ask if you can provide a status update regarding the progress for the modeling demonstration for the new 1-hour NO2 NAAQS. One of the reasons being that we need to try to finish the modeling/demonstration for NO2 before the new standard for SO2 is made effective, which will be in about 60 days; otherwise, we will have to address the new SO2 NAAQS the same way that we have been trying to address the NO2 NAAQS. There is also the request for direct referral made by legal counsel of GAF/BMC that puts us under a (another) time constraint.

Any information that you can provide will be great. Thank you.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

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POOR QUALITY ORIGINAL

APPENDIX V.A.3 - SITE-WIDE

AMERICAN AIR  
DFW INTERNATIONAL

MAINTENANCE FACILITY

EMISSION SOURCE GROUP	Short-Term Emission Rates (lb/hr)					
	NOx	CO	VOC	NON-VOC	SO2	PM
ENGINES	192.480	41.460	15.480	0.000	15.160	13.820
HANGAR II-IV FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
WELDING	0.000	0.000	0.000	0.000	0.000	0.000
PARTS WASHERS	0.000	0.000	0.030	0.000	0.000	0.000
SURFACE COATING	0.000	0.000	5.600	0.000	0.000	1.330
WIPE SOLVENT CLEANING	0.000	0.000	2.040	0.000	0.000	0.000
HANGAR II-IV VEHICLE SURFACE COATING	0.000	0.000	0.430	0.010	0.000	0.000
SPACE HEATERS	0.860	0.360	0.100	0.000	0.010	0.070
BOILERS	13.510	11.350	1.490	0.000	1.030	0.980
WEST WAREHOUSE FUEL STATION No. 1	0.000	0.000	0.018	0.000	0.000	0.000
WEST WAREHOUSE FUEL STATION No. 2	0.000	0.000	0.190	0.000	0.000	0.000
STORAGE TANKS	0.000	0.000	0.190	0.000	0.000	0.000
TOTAL	207.85	53.17	25.73	0.01	16.20	15.30

TERMINAL OPERATIONS FACILITY

EMISSION SOURCE GROUP	Short-Term Emission Rates (lb/hr)					
	NOx	CO	VOC	NON-VOC	SO2	PM
ENGINES	17.590	3.770	1.410	0.000	1.380	1.260
WELDING	0.000	0.000	0.000	0.000	0.000	0.000
PARTS WASHERS	0.000	0.000	0.320	0.000	0.000	0.000
SE HOLD PAD FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
SW HOLD PAD FUEL STATION	0.000	0.000	0.160	0.000	0.000	0.000
SPACE HEATERS & WASHERS	1.650	1.170	0.180	0.000	0.010	0.130
1E TRUCK MAINTENANCE VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
2W AUTOMOTIVE VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
GATE 2 VEHICLE SURFACE COATING	0.000	0.000	3.190	0.010	0.000	0.000
GENERATORS	0.064	0.187	0.064	0.000	0.046	0.128
BOILER	0.220	0.190	0.020	0.000	0.001	0.020
STORAGE TANKS	0.000	0.000	0.320	0.000	0.000	0.000
TOTAL	19.51	5.31	12.19	0.03	1.44	1.54

TEXAS COMMISSION  
ON ENVIRONMENTAL QUALITY

&gt;&gt; Questions or Comment

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## Central Registry Query - Regulated Entity Information

### Regulated Entity Information

**RN Number:** RN102518396**Name:** DSI TRANSPORT INC**Primary Business:** TRUCK WASHING FACILITY**Street Address:** No street address on file.**County:** DALLAS**Nearest City:** DALLAS**State:** TX**Near ZIP Code:** 75011**Physical Location:** 3151 HALIFAX

### Affiliated Customers - Current

Your Search Returned 1 Current Affiliation Records (View Affiliation History)

**1-1 of 1 Records**

CN Number	Customer Name	Customer Role	Details
CN600404628	TRIMAC TRANSPORTATION SOUTH INC	OWNER	

### Industry Type Codes

Code	Classification	Name	Primary
4231	SIC	Terminal and Joint Terminal Maintenance Facilities for Motor Freight	Yes

### Permits, Registrations, or Other Authorizations

There are a total of 2 programs and IDs for this regulated entity. Click on a column name to change the sort order.

**1-2 of 2 Records**

Program ▲	ID Type	ID Number	ID Status
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	DB3234W	ACTIVE
AIR NEW SOURCE PERMITS	PERMIT	24954	CANCELLED

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**TEXAS COMMISSION  
ON ENVIRONMENTAL QUALITY**

TCEQ Home

Go To: Title V Federal Operating Permits  
06/16/2010 -----AirPermits IMS - PROJECT RECORD -----

Company Name: **DSI TRANSPORTS INC**  
Central Registry Id : **CN600404628**

Region: **DFW METROPLEX** Account: **DB3234W** Central Registry Id: **RN102518396**  
County Name: **DALLAS** City: **DALLAS**  
Location : **3151 HALIFAX**

**PROJECT INFORMATION**

Project Administrative Name: **FACILITY NO LONGER IN OPERATION**  
Project Technical Name: **FACILITY NO LONGER IN OPERATION**

Project Number: **108618** Permit Number: **24954** Std/Pbr Number:  
Project Received Date: **06/07/2004** Renewal Date: **05/02/2005** Issued Date: **08/02/2004**

Project Type: **VOIDPMT** Permit Type: **CONSTRUCTION**  
Project Status: **COMPLETE**

Assigned Staff:  
**REVIEWR1\_2: MALARCHER , LOUIS**  
Staff Group:  
**OPERATIONAL SUPPORT**

**FEE**

Reference	Fee Receipt Number	Amount	Fee Receipt Date	Fee Payment Type
-----------	--------------------	--------	------------------	------------------

**TRACKING ELEMENTS**

TE Name	Start Date	Complete Date
<b>CENTRAL REGISTRY UPDATED</b>	<b>08/02/2004</b>	
<b>APIRT RECEIVED PROJECT (DATE)</b>	<b>06/07/2004</b>	

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**Javier Galvan - Re: Direct Referral: Building Materials Corporation of America;  
2010-0896-AIR**

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**From:** Melissa Schmidt  
**To:** Erin Selvera; Javier Galvan; Vic McWherter  
**Date:** 6/23/2010 11:33 AM  
**Subject:** Re: Direct Referral: Building Materials Corporation of America; 2010-0896-AIR  
**CC:** Bridget C. Bohac; Deanna Avalos

---

Ok, I will make that change.

>>> Vic McWherter 6/23/2010 11:18 AM >>>

This may be a bit on the picky side, but the notice would be more reader friendly if the page break fell in a different place.

Could the entire paragraph following the date, time and place of the hearing be moved to the second page?

I realize that for purposes of newspaper publication, this is not an issue.

However, to the extent there is a mailing list receiving the two paged version, I would suggest a different page break for improved readability.



**Javier Galvan - Direct Referral: Building Materials Corporation of America; 2010-0896-AIR**

---

**From:** Melissa Schmidt  
**To:** Erin Selvera; Javier Galvan; Vic McWherter  
**Date:** 6/23/2010 9:58 AM  
**Subject:** Direct Referral: Building Materials Corporation of America; 2010-0896-AIR  
**CC:** Bridget C. Bohac; Deanna Avalos  
**Attachments:** Building Materials NOH.doc

---

**Reply Requested:** By 6/25/2010

The attached is the draft notice for the case listed above. Please review and send your comments/approval by the close of business **Friday, June 25, 2010.**

Provide dates of availability on or after **August 9, 2010.**

Please provide a location for hearing, if other than Austin.

Please provide an estimate of how many people from all parties plan to attend this hearing.

**This case will not be docketed with SOAH nor mailed without the approval of legal.**

Thanks

**NOTICE OF HEARING**  
**BUILDING MATERIALS CORPORATION OF AMERICA**  
**SOAH Docket No. \_\_\_\_\_**  
**TCEQ Docket No. 2010-0896-AIR**  
**Proposed Permit No. 7711A**

**APPLICATION.** Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. The facility will emit the following air contaminants: particulate matter including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides.

The TCEQ executive director has prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Fort Worth Regional Office, and at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the Texas Commission on Environmental Quality Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

**DIRECT REFERRAL.** The Notice of Application and Preliminary Decision was published on March 11, 2010. On June 2, 2010, the Applicant filed a request for direct referral to the State Office of Administrative Hearings (SOAH). Therefore, the chief clerk has referred this application directly to SOAH for a hearing on whether the application complies with all applicable statutory and regulatory requirements.

**CONTESTED CASE HEARING.** The State Office of Administrative Hearings (SOAH) will conduct a formal contested case hearing at:

**DATE:**  
**TIME:**  
**LOCATION:**

The contested case hearing will be a legal proceeding similar to a civil trial in state district court. The hearing will be conducted in accordance with the Chapter 2001, Texas Government Code; Chapter 382, Texas Health and Safety Code; TCEQ rules including 30 Texas Administrative Code

(TAC) Chapter 116, Subchapters A and B; and the procedural rules of the TCEQ and SOAH, including 30 TAC Chapter 80 and 1 TAC Chapter 155.

To request to be a party, you must attend the hearing and show you would be affected by the application in a way not common to the general public. Any person may attend the hearing and request to be a party. Only persons named as parties may participate at the hearing.

**INFORMATION.** If you need more information about the hearing process for this application, please call the Office of Public Assistance, Toll Free, at 1-800-687-4040. General information regarding the TCEQ can be found at [www.TCEQ.state.tx.us](http://www.TCEQ.state.tx.us).

Persons with disabilities who need special accommodations at the hearing should call the SOAH Docketing Department at 512-475-3445, at least one week prior to the hearing.

Further information may also be obtained from Building Materials Corporation of America at the address stated above or by calling Mr. Doug Harris, Plant Engineer, at 214-637-8909.

Issued:

---

LaDonna Castañuela, Chief Clerk  
Texas Commission on Environmental Quality

**Javier Galvan - Fwd: Re: Direct Referral - Building Materials of American; Permit No. 7711A**

---

**From:** Erin Selvera  
**To:** Galvan, Javier; Gould, Mike  
**Date:** 6/22/2010 3:52 PM  
**Subject:** Fwd: Re: Direct Referral - Building Materials of American; Permit No. 7711A

---

FYI: I spoke to Rod Johnson and communicated our position. He said they finally got the modeling runs to work and have QA/QC'd them. They are putting that information together for us. Below is the email I sent to the chief clerk giving the green light to refer this one to SOAH.

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
Phone 512-239-6033  
Fax 512-239-0606

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*Please consider the environment before printing this e-mail*

>>> Erin Selvera 6/22/2010 3:49 PM >>>

Melissa,

This case is ready for referral to SOAH. I'll prepare our documents for the admin record and have them filed in the next few days.

Let me know if you need anything.

Erin

>>> Melissa Schmidt 6/3/2010 2:00 PM >>>

Erin,

I just wanted to make sure that you had received a copy of the applicant's request for direct referral to SOAH. Are there any circumstances that will hinder the processing this referral or are we able to proceed?

Thanks.

## **Javier Galvan - Building Materials Co. Permit 7711A**

---

**From:** Mike Gould  
**To:** Ferrell, David  
**Date:** 6/22/2010 12:00 PM  
**Subject:** Building Materials Co. Permit 7711A  
**CC:** Galvan, Javier; Selvera, Erin  
**Attachments:** E-mail to BMC - GAF requesting 1-hr NO2 demonstration.pdf

---

David:

The following is a chronological listing of events primarily from the technically complete date through today:

date application received: 12.19.08  
date technically complete (and preparation of preliminary decision and draft permit): 2.8.10  
date 2nd notice published: 3.11.10  
date 2nd notice ended: 4.10.10  
date company notified to perform 1-hr NO2 evaluation: 5.11.10  
date company contacted ADMT: 5.13.10  
date RTC to legal: 5.14.10  
date of last "known" contact w/ ADMT: 6.2.10

Also, an email is attached that tasked the consulting company to review NO2 for this project.

Let me know what else is needed. Regards, Mike

Michael D. Gould, P.E.  
Mech-Const Team Leader  
Air Permits Division  
Texas Commission on Environmental Quality

(512) 239 - 1097 Direct  
(512) 239-6626 Fax

## **Javier Galvan - GAF - NSR Permit No. 7711A**

---

**From:** Javier Galvan  
**To:** Kambham, Latha  
**Date:** 6/22/2010 11:16 AM  
**Subject:** GAF - NSR Permit No. 7711A

---

Latha,

I wanted to ask if you can provide a status update regarding the progress for the modeling demonstration for the new 1-hour NO2 NAAQS. One of the reasons being that we need to try to finish the modeling/demonstration for NO2 before the new standard for SO2 is made effective, which will be in about 60 days; otherwise, we will have to address the new SO2 NAAQS the same way that we have been trying to address the NO2 NAAQS. There is also the request for direct referral made by legal counsel of GAF/BMC that puts us under a (another) time constraint.

Any information that you can provide will be great. Thank you.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

## Javier Galvan - BMC timeline

---

**From:** Javier Galvan  
**To:** Gould, Mike  
**Date:** 6/22/2010 11:07 AM  
**Subject:** BMC timeline

---

Mike,

The timeline is as follows:

date application received: 12.19.08  
date technically complete (and preparation of preliminary decision and draft permit): 2.8.10  
date 2nd notice published: 3.11.10  
date 2nd notice ended: 4.10.10  
date company notified to perform 1-hr NO2 evaluation: 5.11.10  
date company contacted ADMT: 5.13.10  
date RTC to legal: 5.14.10  
date of last "known" contact w/ ADMT: 6.2.10

**Javier Galvan - Re: Fwd: BMC**


---

**From:** Erin Selvera  
**To:** Wilson, Mike  
**Date:** 6/18/2010 5:15 PM  
**Subject:** Re: Fwd: BMC  
**CC:** Ferrell, David; Galvan, Javier; Gould, Mike; Harrison, Booker; Howell, Stephanie

---

I think we need to discuss the issues of notice and technical completeness on Monday when Booker is back.

>>> Mike Wilson 6/18/2010 2:43 PM >>>

It seems to me that since NO2 compliance has to be demonstrated that the application is not tech complete. Even if they request dir ref wouldn't we still have the opportunity to complete the tech review?

If it were to get sent to soah before the applicant submitted NO2 modeling and we didn't get to complete the review I'd think we'd recommend denial since they haven't demonstrated compliance with all the rules and regs.?..

Also, even if they could do this, by the time this comes back from soah wouldn't we still tell them to be ready to answer the SO2 question in case it comes up at agenda? Much like we did with the others.

What are the legal requirements for dir ref? Could they request this during the tech rvw?

Lastly, something to think about, since app is not complete do we have any concerns or thoughts on sending them (or not) back to PN?

-----Original Message-----

From: Christine Angeletti  
Cc: Harrison, Booker <BOOHARRI@tceq.state.tx.us>  
To: Selvera, Erin <ESelvera@tceq.state.tx.us>  
Cc: Galvan, Javier <JGalvan@tceq.state.tx.us>  
Cc: Gould, Mike <MGOULD@tceq.state.tx.us>  
To: Wilson, Mike <MPWILSON@tceq.state.tx.us>

Sent: 6/18/2010 11:04:26 AM  
Subject: Re: Fwd: BMC

Regarding Tenaska, I was not the attorney at the time, but from the database it appears that the NAPD was published on 2-4-2009 and the direct referral application was received on 7-14-2009.

The PM and NOx issues arose after the case was directly referred. However they still submitted supplemental modeling because they wanted the evidence on the record in case the commission had issue with it, thus giving them the chance for a remand instead of a denial. However, it is my understanding that our modelers are still unclear or do not have official guidance on how to evaluate this modeling.

Another issue in Tenaska is how we treat recent Commission orders. NRG and Coletto Creek were submitted after Tenaska, however they beat them to the commission. So the question is whether the limits in those permits (specifically CO and PM) are now the official BACT limit or are they treated the same as other permits in the RBLC. i.e. they are considered in the BACT range, but should still be "demonstrated."

Expert testimony from the Applicant in this case suggested that they felt uncomfortable with the NRG limits because it was based on stack testing from Walter J. Scott site that was not certain enough for them. Also



NRG's limits were the result of a settlement agreement and it is my understanding that the Applicant in Colleto Creek argued that the limits were not BACT but they would not be opposed to lowering their limits. I have a feeling with things changing so rapidly this may be an issue that keeps arising. Your thoughts?

Chrissie Angeletti  
Staff Attorney  
(512)239-1204

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**From:** Mike Wilson  
**To:** Angeletti, Christine, Selvera, Erin  
**CC:** Harrison, Booker, Galvan, Javier, Gould, Mike, Ferrell, David, Howell, S...  
**Date:** 6/18/2010 2:43 PM  
**Subject:** Re: Fwd: BMC

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**From:** Christine Angeletti  
**Cc:** Harrison, Booker <BOOHARRI@tceq.state.tx.us>  
**To:** Selvera, Erin <ESelvera@tceq.state.tx.us>  
**Cc:** Galvan, Javier <JGalvan@tceq.state.tx.us>  
**Cc:** Gould, Mike <MGOULD@tceq.state.tx.us>  
**To:** Wilson, Mike <MPWILSON@tceq.state.tx.us>

**Sent:** 6/18/2010 11:04:26 AM  
**Subject:** Re: Fwd: BMC

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Expert testimony from the Applicant in this case suggested that they felt uncomfortable with the NRG limits because it was based on stack testing from Walter J. Scott site that was not certain enough for them. Also NRG's limits were the result of a settlement agreement and it is my understanding that the Applicant in Colletto Creek argued that the limits were not BACT but they would not be opposed to lowering their limits. I have a feeling with things changing so rapidly this may be an issue that keeps arising. Your thoughts?

Chrissie Angeletti  
Staff Attorney  
(512)239-1204

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**Javier Galvan - Re: Fwd: BMC**

---

**From:** Christine Angeletti  
**To:** Selvera, Erin; Wilson, Mike  
**Date:** 6/18/2010 11:04 AM  
**Subject:** Re: Fwd: BMC  
**CC:** Galvan, Javier; Gould, Mike; Harrison, Booker

---

Regarding Tenaska, I was not the attorney at the time, but from the database it appears that the NAPD was published on 2-4-2009 and the direct referral application was received on 7-14-2009.

The PM and NOx issues arose after the case was directly referred. However they still submitted supplemental modeling because they wanted the evidence on the record in case the commission had issue with it, thus giving them the chance for a remand instead of a denial. However, it is my understanding that our modelers are still unclear or do not have official guidance on how to evaluate this modeling.

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**Javier Galvan - Re: Fwd: BMC**

---

**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 6/18/2010 9:04 AM  
**Subject:** Re: Fwd: BMC  
**CC:** Angeletti, Christine; Gould, Mike; Harrison, Booker; Wilson, Mike

---

Erin,

I do not know the exact reason for requesting direct referral, i.e. to avoid having to do SO2 modeling, but yes, BMC was technically complete after performing second public notice. We then asked for a 1-hour NO2 demonstration, and we are still waiting on it.

Javier

>>> Erin Selvera 6/17/2010 4:16 PM >>>

Chrissie worked on Tenaska - Chrissie correct me if I'm wrong, but I think Tenaska was a little different. NO2 didn't go final until way after the case had been direct referred so there was not way to call it back.

Javier - correct me if I get this part wrong. In this case BMC went to 2nd notice so they were technically complete but after that, they sent us NO2 modeling. In the mean time, the Applicant chose direct refer the case to SOAH to avoid having to do SO2 modeling. However, since we have not completed our review of the NO2 modeling, our tech review of that is not complete so we are not ready to complete our RTC, nor are we ready for the case to go to hearing.

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
Phone 512-239-6033  
Fax 512-239-0606

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>>> Mike Wilson 6/17/2010 3:47 PM >>>

What did we do on Tenaska? Did the applicant request direct referral before the technical review was complete? I wouldn't have thought that to be a possibility until the review was complete.

>>> Erin Selvera 6/17/2010 3:08 PM >>>

I spoke with Rod Johnson yesterday about BMC and told them that we are not inclined to give the go ahead on the direct referral for this one because we have not completed our tech review for the NO2 modeling. He raised the issue of how Tenaska was handled and wants to go above my head on this issue because his client wants to avoid having to do SO2 modeling. When you have a moment, I'd like to confer about the issue so we can give a unified response that includes upper management input.

I think we may run in to this issue again in the future due to the adoption of NO2, SO2, and PM2.5 standards, etc.

**Javier Galvan - Re: Fwd: BMC**

---

**From:** Erin Selvera  
**To:** Wilson, Mike  
**Date:** 6/17/2010 4:16 PM  
**Subject:** Re: Fwd: BMC  
**CC:** Angeletti, Christine; Galvan, Javier; Gould, Mike; Harrison, Booker

---

Chrissie worked on Tenaska - Chrissie correct me if I'm wrong, but I think Tenaska was a little different. NO2 didn't go final until way after the case had been direct referred so there was not way to call it back.

Javier - correct me if I get this part wrong. In this case BMC went to 2nd notice so they were technically complete but after that, they sent us NO2 modeling. In the mean time, the Applicant chose direct refer the case to SOAH to avoid having to do SO2 modeling. However, since we have not completed our review of the NO2 modeling, our tech review of that is not complete so we are not ready to complete our RTC, nor are we ready for the case to go to hearing.

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
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I think we may run in to this issue again in the future due to the adoption of NO2, SO2, and PM2.5 standards, etc.

Erin René Selvera  
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Texas Commission on Environmental Quality  
Phone 512-239-6033  
Fax 512-239-0606

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## **Javier Galvan - Re: Building Materials Company (BMC)**

---

**From:** Erin Selvera  
**To:** Galvan, Javier; Gould, Mike  
**Date:** 6/11/2010 10:39 AM  
**Subject:** Re: Building Materials Company (BMC)  
**CC:** Ferrell, David; Harrison, Booker; Wilson, Mike

---

Thanks for looking in to this Mike. I'll chat with BMC's attorney.

>>> Mike Gould 6/10/2010 6:00 PM >>>  
Erin/Javier:

I've discussed the issues associated with BMC with the Assistant Director. We agree that it would be best to not direct refer the project to SOAH before we have had an opportunity to complete the technical review on the NO2 issue. Additionally, it may be necessary to expand our RTC response with the NO2 data before it is filed. We are anticipating the company's submittal on the NO2 evaluation in the near future. Let me know if you have questions. Mike

Michael D. Gould, P.E.  
Mech-Const Team Leader  
Air Permits Division  
Texas Commission on Environmental Quality

(512) 239 - 1097 Direct  
(512) 239-6626 Fax

## **Javier Galvan - Building Materials Company (BMC)**

---

**From:** Mike Gould  
**To:** Galvan, Javier; Selvera, Erin  
**Date:** 6/10/2010 6:00 PM  
**Subject:** Building Materials Company (BMC)  
**CC:** Ferrell, David; Harrison, Booker; Wilson, Mike

---

Erin/Javier:

I've discussed the issues associated with BMC with the Assistant Director. We agree that it would be best to not direct refer the project to SOAH before we have had an opportunity to complete the technical review on the NO2 issue. Additionally, it may be necessary to expand our RTC response with the NO2 data before it is filed. We are anticipating the company's submittal on the NO2 evaluation in the near future. Let me know if you have questions. Mike

Michael D. Gould, P.E.  
Mech-Const Team Leader  
Air Permits Division  
Texas Commission on Environmental Quality

(512) 239 - 1097 Direct  
(512) 239-6626 Fax

## **Javier Galvan - BMC**

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 6/10/2010 4:28 PM  
**Subject:** BMC

---

Do we have any news on the status of the BMC application?



**Javier Galvan - Fwd: Re: BMC**

---

**From:** Mike Gould  
**To:** Howell, Stephanie  
**Date:** 6/7/2010 3:37 PM  
**Subject:** Fwd: Re: BMC  
**CC:** Ferrell, David; Galvan, Javier

---

Stephanie:

Rod Johnson is Building Materials' attorney and he requested a direct referral of the Building Materials project to SOAH within 30-days of his June 3rd letter. This application was technically complete, until the NO2 1-hr came into existence and now it is not technically complete. The company is modeling the NO2 impacts. Erin Selvera, our staff attorney, asks a couple of questions below and wants direction from "management."

Should we honor the Rod Johnson request?

**My Response:** No. The permit is no longer technically complete and I wouldn't recommend going to SOAH betting on whether or not there might be problems with the modeling. I suggest ELD should advise Rod Johnson to revise his direct referral request to be tied to the NO2 technical complete date.

Should we re-accomplish the second notice package since the application is no longer technically complete?

**My Response:** No. The package was technically complete when it went to second notice (03/11/2010). It was after the second notice that NO2 became effective. I don't think anything would be gained by repeating second notice. There should be no changes to the draft permit conditions as a result of the NO2 evaluation. We have only the one commenter who was incarcerated in the Dallas County jail when he commented.

Do you want to respond to Erin; or should Mike or Steve? I would have responded to Erin, but we felt like she wanted some one from management to give the guidance. I am only providing suggests with regard to the Erin's questions. Mike

>>> Javier Galvan 6/7/2010 2:40 PM >>>  
Mike,

Erin has asked that I speak with APD upper management to determine the best course of action regarding the fact that legal counsel of the company has asked for direct referral within 30 days of the date of the letter. Erin wants to know if we want to require a second 2nd public notice since the project was not technically complete and if APD wants to make the decision or if APD wants OLS to make the decision (for us). Erin is ready to file the RTC with the OCC, but she cannot until I tell her that we are technically complete.

A second item is a completed renewal project still shows pending in the IMS. The permit no. is 9261, and the project no. is 152700. The amendment project apparently has been closed, but the renewal project is for some reason still open/pending. I have both mikeys. Thanks.

Javier

>>> Erin Selvera 6/4/2010 11:10 AM >>>

Have you been in contact with the Applicant about the NO2 modeling? I don't think their attorney's are aware of this. We may have some issues with the fact that we already did 2nd notice which states we have completed

**Javier Galvan - Fwd: Re: BMC**

**From:** Mike Gould  
**To:** Galvan, Javier  
**Date:** 6/7/2010 3:16 PM  
**Subject:** Fwd: Re: BMC

---

What date was the start of the second public comment period?

>>> Javier Galvan 6/7/2010 2:40 PM >>>  
 Mike,

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Javier

>>> Erin Selvera 6/4/2010 11:10 AM >>>  
 Have you been in contact with the Applicant about the NO2 modeling? I don't think their attorney's are aware of this. We may have some issues with the fact that we already did 2nd notice which states we have completed tech review. This may be a notice issue. Have you talked to your management about this?

>>> Javier Galvan 6/4/2010 11:07 AM >>>  
 Erin,

We are still resolving the new NO2 1-hour standard. I do not know yet when exactly we will finish with it. It is my understanding that when the new modeling results are submitted, and deemed acceptable, we can then say that we have completed the technical review of the project. Thanks.

Javier

>>> Erin Selvera 6/4/2010 10:53 AM >>>  
 Hi Javier,  
 I assume you received the letter asking that BMC be direct referred to SOAH. They are asking that the hearing be set w/in 30 days of their letter. I wanted to double check with you to see if APD is done with the tech review for this case. I need to respond to Melissa Schmidt in the chief clerk's office ASAP to let her know whether to proceed with the referral. Let me know as soon as you can.  
 Thanks,  
 Erin

Erin René Selvera  
 Attorney, Environmental Law Division  
 Texas Commission on Environmental Quality  
 Phone 512-239-6033  
 Fax 512-239-0606

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**Javier Galvan - Re: BMC**

---

**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 6/4/2010 11:10 AM  
**Subject:** Re: BMC  
**CC:** Gould, Mike; Harrison, Booker

---

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Thanks,

Erin

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
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Brown M<sup>c</sup>Carroll  
L.L.P.

111 Congress Avenue, Suite 1400, Austin, Texas 78701-4043  
512-472-5456 fax 512-479-1101

direct (512) 479-1125 rjohnson@mailbmc.com

June 2, 2010

LaDonna Castañuela, Chief Clerk  
Texas Commission on Environmental Quality  
P. O. Box 13087, MC 105  
Austin, Texas 78711-3087

*Via Hand Delivery &  
U.S. Mail*

Re: Request for Direct Referral  
Building Materials Corporation of America  
Air Quality Permit Amendment Application for Permit No. 7711A

Dear Ms. Castañuela:

Pursuant to 30 TAC § 55.210, Building Materials Corporation of America ("BMCA") requests TCEQ refer the above-referenced application directly to the State Office of Administrative Hearings for a hearing on the application.

The application was filed on December 18, 2008 and the amendment is required pursuant to Agreed Order Docket No. 2008-0805-AIR-E. BMCA is operating under its second extension of the Order deadline. Therefore, to expedite the process, BMCA requests that a hearing date be set for no later than 30 days from the date of this request.

If you have any questions, please contact me at (512) 479-1125.

Sincerely,



Rod Johnson

cc: Erin Selvera, Legal Division, TCEQ  
Javier Galván, Air Permits Division, TCEQ

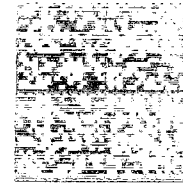
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Javier Galvan  
Air Permits Division  
Texas Commission on Environmental Quality  
P. O. Box 13087, MC 103  
Austin, Texas 78711-3087

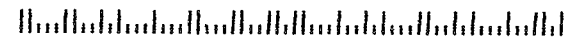
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# **Javier Galvan - Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hrModelingRequest**

---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**Date:** 6/2/2010 11:12 AM  
**Subject:** Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hrModelingRequest  
**CC:** "Christine Chambers" <CChambers@trinityconsultants.com>, "Daniel Menendez" <DMenende@tceq.state.tx.us>, "Javier Galvan" <JGalvan@tceq.state.tx.us>, "Latha Kambham" <LKambham@trinityconsultants.com>, "Harris, Doug" <dharris@gaf.com>

---

Dan,

Thank you very much for your response and additional guidance. We will provide all the details and documentation along with the modeling results submittal.

Regards,  
 Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
 Consultant

Trinity Consultants  
 12770 Merit Drive, Suite 900  
 Dallas, TX 75251  
 Tel: 972-661-8100  
 Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)

\*\*\*\*\*

From: "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
 To: "Latha Kambham" <LKambham@trinityconsultants.com>  
 Cc: "Daniel Menendez" <DMenende@tceq.state.tx.us>, "Javier Galvan" <JGalvan@tceq.state.tx.us>, "Christine Chambers" <CChambers@trinityconsultants.com>  
 Date: 06/02/2010 11:06 AM  
 Subject: Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr ModelingRequest

---

Latha,

I received your phone call this morning. I do not have any additional questions. Please be sure to fully document the approaches used in the modeling analysis. Be sure to provide sufficient technical justification for the sources being evaluated, all model options/techniques used, and any data relied upon for making the demonstration.

**From:** Daniel Jamieson  
**To:** Kambham, Latha  
**CC:** Chambers, Christine; Galvan, Javier; Menendez, Daniel  
**Date:** 6/2/2010 11:06 AM  
**Subject:** Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request

Latha,

I received your phone call this morning. I do not have any additional questions. Please be sure to fully document the approaches used in the modeling analysis. Be sure to provide sufficient technical justification for the sources being evaluated, all model options/techniques used, and any data relied upon for making the demonstration.

Thanks,  
Dan

>>> Latha Kambham <[LKambham@trinityconsultants.com](mailto:LKambham@trinityconsultants.com)> 5/26/2010 8:55 PM >>>  
Dan,

Please find attached a memo with responses to your comments and the MS Excel file with the data used to calculate the NO2 1-hour background concentration. Please let us know if you have any additional questions or comments.

Thank you,  
Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

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\*\*\*\*\*

From:  
"Daniel Jamieson" <[DJamieso@tceq.state.tx.us](mailto:DJamieso@tceq.state.tx.us)>  
To:  
"Latha Kambham" <[LKambham@trinityconsultants.com](mailto:LKambham@trinityconsultants.com)>  
Cc:  
"Daniel Menendez" <[DMenende@tceq.state.tx.us](mailto:DMenende@tceq.state.tx.us)>, "Javier Galvan" <[JGalvan@tceq.state.tx.us](mailto:JGalvan@tceq.state.tx.us)>  
Date:  
05/24/2010 12:24 PM  
Subject:  
Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request

Latha,

I would not characterize the information contained in the memo as the final TCEQ approved methodology. The approaches described are general and there are a few options listed for other approaches based on the initial set of modeling (for example, step 2 and PVMRM/OLM options). These other

approaches are listed in the memo, but there is not sufficient detail or technical justification provided for these other approaches. Furthermore, for the PVMRM/OLM options, there is no discussion or technical justification on what inputs will be used for the required parameters. The use of these options should be discussed further and a protocol sent in for review if they are to be followed.

A few other general comments:

1. Page 2, footnote 4 - Just to make clear, this is not guidance that EPA has provided. These two items were discussed at the annual EPA modeling workshop. They represent interim values until EPA develops guidance.
2. Related to number 1 above, the significant impact level of 10 ug/m3 has not been proposed by the TCEQ. It is an interim value until EPA develops guidance.
3. Regarding background concentrations. Please provide the data used to calculate the background concentrations provided in table 2. Also, be sure to provide a discussion on why the selected monitor is appropriate to use for the project location.

Thanks,  
Dan

>>> Latha Kambham <[LKambham@trinityconsultants.com](mailto:LKambham@trinityconsultants.com)> 5/20/2010 4:00 PM >>>  
Mr. Jamieson,

Thank you very much for discussing the proposed modeling approach for the NO2 1-hr NAAQS modeling for the GAF Dallas Plant and providing additional guidance.

Please find attached a revised memorandum that summarizes the approved modeling approach per the conference call this morning. We would appreciate your response confirming the revised modeling approach. Please

let us know if you have any additional comments.

Thanks,  
Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

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Dallas, TX 75251  
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[www.trinityconsultants.com](http://www.trinityconsultants.com)

\*\*\*\*\*

From:  
Latha Kambham/Trinity Consultants  
To:



"Daniel Jamieson" <[DJamieso@tceq.state.tx.us](mailto:DJamieso@tceq.state.tx.us)>

Cc:

[JGalvan@tceq.state.tx.us](mailto:JGalvan@tceq.state.tx.us), [dmenende@tceq.state.tx.us](mailto:dmenende@tceq.state.tx.us),  
[druggeri@tceq.state.tx.us](mailto:druggeri@tceq.state.tx.us), [dharris@gaf.com](mailto:dharris@gaf.com), [FBright@gaf.com](mailto:FBright@gaf.com),  
[RJohnson@mailbmc.com](mailto:RJohnson@mailbmc.com), Christine Chambers/Trinity Consultants@TCI\_Dallas,  
Latha Kambham <[LKambham@trinityconsultants.com](mailto:LKambham@trinityconsultants.com)>

Date:

05/19/2010 08:28 PM

Subject:

Re: GAF Dallas Plant: Conference Call Details for the Pre-modeling  
Meeting on May 20, 2010 at 11:00 AM

Mr. Jamieson,

Please find attached a brief memorandum summarizing the proposed NO2 1-hr

modeling approach to demonstrate compliance with the new NO2 1-hr NAAQS.

Javier confirmed that he is available for the 11:00 AM call tomorrow.

Please call me at (972) 661-8100, if you need any additional information  
prior to the conference call.

Thank you,  
Latha

[attachment "GAF Dallas Plant\_ NO2 1-hr Modeling\_Proposed Approach  
(051910).pdf" deleted by Latha Kambham/Trinity Consultants]

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

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Dallas, TX 75251  
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\*\*\*\*\*

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# **Javier Galvan - Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request**

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**Date:** 5/26/2010 8:57 PM  
**Subject:** Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request  
**CC:** "Daniel Menendez" <DMenende@tceq.state.tx.us>, "Javier Galvan" <JGalvan@tceq.state.tx.us>, "Latha Kambham" <LKambham@trinityconsultants.com>, Christine Chambers <CChambers@trinityconsultants.com>  
**Attachments:** GAF NO2 1-hr Modeling\_Response to Email Comments (052610).pdf; GAF Dallas Plant\_NO2 Background Concentration (052610).xlsx

Dan,

Please find attached a memo with responses to your comments and the MS Excel file with the data used to calculate the NO2 1-hour background concentration. Please let us know if you have any additional questions or comments.

Thank you,  
 Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
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 Tel: 972-661-8100  
 Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)

\*\*\*\*\*

**From:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**To:** "Latha Kambham" <LKambham@trinityconsultants.com>  
**CC:** "Daniel Menendez" <DMenende@tceq.state.tx.us>, "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**Date:** 05/24/2010 12:24 PM  
**Subject:** Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request

**TO:** Mr. Daniel Jamieson, TCEQ Modeling Group  
**CC:** Mr. Javier Galvan, TCEQ Air Permits Division  
Mr. Daniel Menendez, TCEQ Modeling Group  
Mr. Doug Harris and Mr. Fred Bright, GAF Materials Corporation  
Mr. Rodman Johnson, Brown McCarroll, L.L.P  
Ms. Latha Kambham, Trinity Consultants  
**FROM:** Ms. Christine M. Otto Chambers, Trinity Consultants  
**DATE:** May 26, 2010  
**RE:** GAF Dallas Plant – Response to the Comments Provided via email on May 24, 2010

Mr. Jamieson,

Thank you for providing additional clarification regarding the revised modeling approach via email on May 24, 2010. This memo provides the responses to each of your comments. The TCEQ comments are noted in *Italics*.

*The approaches described are general and there are a few options listed for other approaches based on the initial set of modeling (for example, step 2 and PVMRM/OLM options). These other approaches are listed in the memo, but there is not sufficient detail or technical justification provided for these other approaches. Furthermore, for the PVMRM/OLM options, there is no discussion or technical justification on what inputs will be used for the required parameters. The use of these options should be discussed further and a protocol sent in for review if they are to be followed.*

**Response:** Currently, GAF assumes that the use of PVMRM/OLM options will not be required. However, if it is determined that these options will be used, a protocol will be submitted to the TCEQ and EPA for review and approval.

*A few other general comments:*

*1. Page 2, footnote 4 - Just to make clear, this is not guidance that EPA has provided. These two items were discussed at the annual EPA modeling workshop. They represent interim values until EPA develops guidance.*

**Response:** Thank you for providing the clarification. GAF will use the interim values for the modeling project.

*2. Related to number 1 above, the significant impact level of 10 ug/m3 has not been proposed by the TCEQ. It is an interim value until EPA develops guidance.*

**Response:** Thank you for providing the clarification. GAF will use the interim values for the modeling project.

*3. Regarding background concentrations. Please provide the data used to calculate the background concentrations provided in table 2. Also, be sure to provide a discussion on why the selected monitor is appropriate to use for the project location.*

**Response:** The GAF Dallas Plant is located at 2600 Singleton Blvd, Dallas, Dallas County, Texas. Currently, there are three active State and Local Air Monitoring Systems (SLAMS) monitoring stations for Nitrogen Dioxide (NO<sub>2</sub>) located in the Dallas County. A table summarizing the site ID, address, and approximate distance from the GAF Dallas Plant for each of these three monitors is provided below:

EPA Site ID	Address	Approximate Distance from GAF Dallas Plant
48-113-0069	1415 Hinton Street, Dallas	3 miles North
48-113-0075	12532 1/2 Nuestra Drive, Dallas	10 miles Northeast
48-113-0087	3277 W. Redbird Lane, Dallas	7 miles South

GAF proposes to use the Site ID 48-113-0069 to obtain the NO<sub>2</sub> background concentration based on the following:

- EPA Air Quality System (AQS) provides the highest 1<sup>st</sup> high (H1H), highest 2<sup>nd</sup> high (H2H), and annual NO<sub>2</sub> concentration values for 1998-2008 for the above mentioned monitoring stations.<sup>1</sup> Site ID 48-113-0069 monitored the highest concentration values for H1H, H2H, and annual averaging periods for 8 of the 10 years. Furthermore, the trend in recent years (based on 2007 and 2008 year information) indicates higher monitored values for Site ID 48-113-0069, when compared with the other two monitoring stations.
- This monitor is located at the closest proximity to the GAF Dallas Plant.

Therefore, GAF proposes to use this monitor to obtain the NO<sub>2</sub> monitoring concentration, which will further be used as the background concentration in the NO<sub>2</sub> (1-hour) NAAQS analysis performed for GAF Dallas Plant.

Per EPA guidance, the background concentration for the NO<sub>2</sub> (1-hour) NAAQS analysis should be calculated as the 3-year average of the 8<sup>th</sup>-highest daily maximum 1-hour concentrations over three years of monitor data.<sup>2</sup> Currently, the EPA Air database does not process the NO<sub>2</sub> monitoring value based on the current form of the standard. Therefore, for determining the background concentration, the hourly NO<sub>2</sub> monitored values for EPA Site ID 48-113-0069 were obtained from the EPA AQS database for the most recent three years (2007-2009).<sup>3</sup> Under this EPA guidance, a day is classified as complete if it has at least 75% of the hourly concentrations recorded (i.e., at least 18 hours per day). A quarter is classified as complete if it has at least 75% of the sampling days with complete data (i.e., at least 67 to 69 depending on the quarter). A year is classified as complete if it has four complete quarters.<sup>4</sup> The obtained hourly values for EPA Site ID 48-113-0069 meet the above completeness criteria for all three years.

Per TCEQ's request, a MicroSoft (MS) Excel file [GAF Dallas Plant\_NO2 Background Concentration (052510).xlsx] is provided, which was used to calculate the background concentration at the EPA monitor (Site ID: 48-113-0069) for each of the three years (2007 through 2009) [the monitored values are shown in tabs "2007 Monitored Value", "2008 Monitored Value", and "2009 Monitored Value" in the attached MS Excel file]. To calculate the background concentration, the 8<sup>th</sup>-highest daily maximum 1-hour concentration was obtained [as shown in tabs "2007-H8H", "2008-H8H", and "2009-H8H" in the attached MS Excel file]. The average 8<sup>th</sup>-highest daily maximum 1-hour

<sup>1</sup> Information is obtained from EPA Air Database (URL: <http://www.epa.gov/oar/data/geosel.html>)

<sup>2</sup> 75 Fed. Reg. 6474, "Primary National Ambient Air Quality Standards for Nitrogen Dioxide; Final Rule" (2010).

<sup>3</sup> <http://www.epa.gov/ttn/airs/airsaqs/detaildata/downloadaqsdata.htm>

<sup>4</sup> 75 Fed. Reg. at 6532.

Mr. Jamieson - Page 3

May 26, 2010

concentration was calculated, as provided in the "Summary" tab of the attached MS Excel file. This value will be used as the representative background concentration in the 1-hour NO<sub>2</sub> NAAQS compliance demonstration.

Year	NO <sub>2</sub> Daily Maximum 1-hr Concentration <sup>(1)</sup>	
	(ppm)	(ug/m <sup>3</sup> )
2007	0.056	105.31
2008	0.056	105.31
2009	0.051	95.96
<b>Average</b>	<b>0.054</b>	<b>102.19</b>

<sup>(1)</sup> The concentrations correspond to the H8H values for each year.

**PPM TO MILLIGRAM/ MICROGRAM PER CUBIC METER**

PPM CONCENTRATION VALUE	1
MOLECULAR WEIGHT	46.0055
TEMPERATURE IN DEG CELSIUS	25
CONCENTRATION IN <u>MILLIGRAMS</u> PER CUBIC METER	1.880
CONCENTRATION IN <u>MICROGRAMS</u> PER CUBIC METER	1880.5

**Javier Galvan - Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr ModelingRequest**

---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**Date:** 5/25/2010 4:30 PM  
**Subject:** Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr ModelingRequest  
**CC:** "Daniel Menendez" <DMenende@tceq.state.tx.us>, "Javier Galvan" <JGalvan@tceq.state.tx.us>, "Latha Kambham" <LKambham@trinityconsultants.com>

---

Daniel,

I apologize for the delayed response. I was out of the office since yesterday afternoon. I will discuss these additional details with GAF and provide the information to you.

Thanks  
 Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
 Consultant

Trinity Consultants  
 12770 Merit Drive, Suite 900  
 Dallas, TX 75251  
 Tel: 972-661-8100  
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 \*\*\*\*\*

**From:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**To:** "Latha Kambham" <LKambham@trinityconsultants.com>  
**Cc:** "Daniel Menendez" <DMenende@tceq.state.tx.us>, "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**Date:** 05/24/2010 12:24 PM  
**Subject:** Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request

---

Latha,

I would not characterize the information contained in the memo as the final TCEQ approved methodology. The approaches described are general and there are a few options listed for other approaches based on the initial set of modeling (for example, step 2 and PVMRM/OLM options). These other approaches are listed in the memo, but there is not sufficient detail or technical justification provided for these other approaches. Furthermore, for the PVMRM/OLM options, there is no



**Javier Galvan - Re: Building Materials Corporation - NSR No. 7711A - draft RTC**

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**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 5/25/2010 9:02 AM  
**Subject:** Re: Building Materials Corporation - NSR No. 7711A - draft RTC

---

Thank you Erin. We are working to resolve the issue, but at this point in time I do not know how much longer it may be. I will definitely inform you when I know that we have completed our technical review (of NO2). Thanks again.

Javier

>>> Erin Selvera 5/24/2010 5:28 PM >>>


Javier,

I spoke with BMC's attorney today. He said that they would most likely be requesting direct referral on this application in the next few days. When I get word that you are done with tech review for NO2, I'll wrap up the RTC. I just wanted to give you a heads up. Let me know if you have any questions or concerns.

Erin

Erin René Selvera  
Attorney, Environmental Law Division  
Texas Commission on Environmental Quality  
Phone 512-239-6033  
Fax 512-239-0606

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 Please consider the environment before printing this e-mail

>>> Javier Galvan 5/14/2010 3:56 PM >>>

Erin,

Sorry for all of these e-mails, but I have been asked to ask of you one more request. My section manager has sent the draft RTC to Booker today, and due to the new 1-hour NO2 NAAQS promulgated by the EPA, we are having to review the project again. In other words, before the new rule, we were technically complete; however, as of now we are not, but we working on the "issue" and hope to resolve it as early as next Friday (we are re-running some modeling to demonstrate compliance with the new standard).

Having written all of that, can you notify me when you are ready to file the RTC with the OCC, assuming no changes to the RTC or after all changes are incorporated, before you actually do so? The reason is that if you are ready before we can state that we are technically complete, it will allow us to finish our technical review of the permit application before you file the RTC with the OCC. Thank you, and sorry for the long e-mail.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

**From:** Daniel Jamieson  
**To:** Kambham, Latha  
**CC:** Galvan, Javier; Menendez, Daniel  
**Date:** 5/24/2010 12:23 PM  
**Subject:** Re: GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request

Latha,

I would not characterize the information contained in the memo as the final TCEQ approved methodology. The approaches described are general and there are a few options listed for other approaches based on the initial set of modeling (for example, step 2 and PVMRM/OLM options). These other approaches are listed in the memo, but there is not sufficient detail or technical justification provided for these other approaches. Furthermore, for the PVMRM/OLM options, there is no discussion or technical justification on what inputs will be used for the required parameters. The use of these options should be discussed further and a protocol sent in for review if they are to be followed.

A few other general comments:

1. Page 2, footnote 4 - Just to make clear, this is not guidance that EPA has provided. These two items were discussed at the annual EPA modeling workshop. They represent interim values until EPA develops guidance.
2. Related to number 1 above, the significant impact level of 10 ug/m3 has not been proposed by the TCEQ. It is an interim value until EPA develops guidance.
3. Regarding background concentrations. Please provide the data used to calculate the background concentrations provided in table 2. Also, be sure to provide a discussion on why the selected monitor is appropriate to use for the project location.

Thanks,  
Dan

>>> Latha Kambham <[LKambham@trinityconsultants.com](mailto:LKambham@trinityconsultants.com)> 5/20/2010 4:00 PM >>>  
Mr. Jamieson,

Thank you very much for discussing the proposed modeling approach for the NO2 1-hr NAAQS modeling for the GAF Dallas Plant and providing additional guidance.

Please find attached a revised memorandum that summarizes the approved modeling approach per the conference call this morning. We would appreciate your response confirming the revised modeling approach. Please let us know if you have any additional comments.

Thanks,  
Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

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\*\*\*\*\*

From:  
Latha Kambham/Trinity Consultants  
To:  
"Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
Cc:  
[JGalvan@tceq.state.tx.us](mailto:JGalvan@tceq.state.tx.us), [dmenende@tceq.state.tx.us](mailto:dmenende@tceq.state.tx.us),  
[druggeri@tceq.state.tx.us](mailto:druggeri@tceq.state.tx.us), [dharris@gaf.com](mailto:dharris@gaf.com), [FBright@gaf.com](mailto:FBright@gaf.com),  
[RJohnson@mailbmc.com](mailto:RJohnson@mailbmc.com), Christine Chambers/Trinity Consultants@TCI\_Dallas,  
Latha Kambham <[LKambham@trinityconsultants.com](mailto:LKambham@trinityconsultants.com)>  
Date:  
05/19/2010 08:28 PM  
Subject:  
Re: GAF Dallas Plant: Conference Call Details for the Pre-modeling  
Meeting on May 20, 2010 at 11:00 AM

Mr. Jamieson,

Please find attached a brief memorandum summarizing the proposed NO2 1-hr modeling approach to demonstrate compliance with the new NO2 1-hr NAAQS. Javier confirmed that he is available for the 11:00 AM call tomorrow.

Please call me at (972) 661-8100, if you need any additional information prior to the conference call.

Thank you,  
Latha

[attachment "GAF Dallas Plant\_ NO2 1-hr Modeling-Proposed Approach (051910).pdf" deleted by Latha Kambham/Trinity Consultants]

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

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12770 Merit Drive, Suite 900  
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# **Javier Galvan - GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request**

---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**Date:** 5/20/2010 4:01 PM  
**Subject:** GAF Dallas Plant: Approved Modeling Approach for NO2 1-hr Modeling Request  
**CC:** Christine Chambers <CChambers@trinityconsultants.com>, <dharris@gaf.com>, <dmenende@tceq.state.tx.us>, <druggeri@tceq.state.tx.us>, <FBright@gaf.com>, <JGalvan@tceq.state.tx.us>, Latha Kambham <LKambham@trinityconsultants.com>, <RJohnson@mailbmc.com>  
**Attachments:** GAF NO2 1-hr Modeling\_Approved Approach (052010).pdf

---

Mr. Jamieson,

Thank you very much for discussing the proposed modeling approach for the NO2 1-hr NAAQS modeling for the GAF Dallas Plant and providing additional guidance.

Please find attached a revised memorandum that summarizes the approved modeling approach per the conference call this morning. We would appreciate your response confirming the revised modeling approach. Please let us know if you have any additional comments.

Thanks,  
 Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
 Consultant

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**From:** Latha Kambham/Trinity Consultants  
**To:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**Cc:** JGalvan@tceq.state.tx.us, dmenende@tceq.state.tx.us, druggeri@tceq.state.tx.us, dharris@gaf.com, FBright@gaf.com, RJohnson@mailbmc.com, Christine Chambers/Trinity Consultants@TCI\_Dallas, Latha Kambham <LKambham@trinityconsultants.com>  
**Date:** 05/19/2010 08:28 PM  
**Subject:** Re: GAF Dallas Plant: Conference Call Details for the Pre-modeling Meeting on May 20, 2010 at 11:00 AM

---



## MEMORANDUM

**TO:** Mr. Daniel Jamieson, TCEQ Modeling Group  
**CC:** Mr. Javier Galvan, TCEQ Air Permits Division  
Mr. Daniel Menendez and Mr. Domnick Ruggeri, TCEQ Modeling Group  
Mr. Doug Harris and Mr. Fred Bright, GAF Materials Corporation  
Mr. Rodman Johnson, Brown McCarroll, L.L.P  
Ms. Latha Kambham, Trinity Consultants  
**FROM:** Ms. Christine M. Otto Chambers, Trinity Consultants  
**DATE:** May 20, 2010  
**RE:** GAF Dallas Plant – TCEQ Approved Modeling Approach for NO<sub>2</sub> (1-hour) Modeling

**Conference Call Date:** May 20, 2010

**Conference Call Attendees:**

Mr. Daniel Jamieson and Mr. Javier Galvan, TCEQ  
Mr. Doug Harris and Mr. Fred Bright, GAF Materials Corporation  
Mr. Rodman Johnson, Brown McCarroll, L.L.P  
Ms. Christine Chambers and Latha Kambham, Trinity Consultants

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the Texas Commission of Environmental Quality (TCEQ), on December 18, 2008 (2008 NSR permit amendment application). As part of this permit amendment application, GAF subsequently submitted an air dispersion modeling report on May 5, 2009. On May 11, 2010, TCEQ requested an air dispersion modeling analysis to demonstrate that emissions of nitrogen dioxide (NO<sub>2</sub>) would not cause or contribute to a violation of the newly promulgated NO<sub>2</sub> 1-hour National Ambient Air Quality Standard (NAAQS).<sup>1,2</sup>

Per the conference call with TCEQ on May 20, 2010, this memo summarizes the final TCEQ approved methodology that will be followed in performing the NO<sub>2</sub> (1-hour) State NAAQS modeling analysis for the GAF Dallas Plant.

For the NO<sub>2</sub> 1-hour NAAQS compliance demonstration, GAF will use the same approach for the UTM coordinate system, building wake effects, receptor grids, and meteorological data as detailed in the May 2009 air dispersion modeling report, with the following updates:<sup>3</sup>

- The most current version of the AERMOD model (version 09292) will be used and

<sup>1</sup> Per email from Mr. Javier Galvan, TCEQ, to Ms. Latha Kambham, Trinity Consultants, on May 11, 2010.

<sup>2</sup> The new NO<sub>2</sub> 1-hour NAAQS was published in the Federal Register (75 FR 6474) on February 9, 2010, and went into effect on April 12, 2010.

<sup>3</sup> As discussed during the conference call, the State NAAQS NO<sub>2</sub> (1-hour) modeling analysis will be conducted with one year of meteorological data, unless stated otherwise.

- The most current version of AERMOD terrain preprocessor (AERMAP version 09040) will be used

The specific modeling approach that is approved by the TCEQ for use in the State NAAQS Analysis for NO<sub>2</sub> 1-hour modeling is provided below.

### Step 1: Significance Analysis

Per TCEQ guidance, the Significance Analysis considers the emissions associated with only the proposed project to determine whether it will have a significant impact upon the surrounding area. As stipulated in the 2008 NSR permit amendment application, there are three sources that result in an increase in NO<sub>x</sub> emissions. Table 1 lists these sources and the emission rates that will be used in the NO<sub>2</sub> (1-hour) Significance Analysis.

**Table 1. Emission Sources and NO<sub>x</sub> Emission Rates for Significance Analysis**

EPN	Source Description	Currently Permitted Emission Rate (lb/hr)	Proposed Allowable Emission Rate (lb/hr)	Increase in Emission Rate (lb/hr)
8	Thermal Oxidizer Exhaust Stack	0.72	1.90	1.18
8A	Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack			
WHBLR1	Waste Heat Recovery Boiler Natural Gas Burner Side	--	0.47	0.47

Per the Ambient Ratio Method, the NO<sub>x</sub> emissions will be multiplied by 0.75 to convert to NO<sub>2</sub> emission rates for air dispersion modeling purposes.<sup>4</sup>

In the Significance Analysis, the maximum modeled ground-level concentrations (i.e., highest first high [H1H] modeled concentration) of NO<sub>2</sub> will be compared to the modeling significance level (MSL) of 10 µg/m<sup>3</sup>, per EPA guidance.<sup>4</sup> If the modeled H1H concentration is below the TCEQ proposed MSL, demonstration is complete and no further analysis will be required.

If compliance is not demonstrated with the Significance Analysis, a Full Impact Analysis will be conducted as explained in Steps 2 and 3 below.

### Step 2: Full Impact Analysis – Screening Analysis

As a first step in a State NAAQS analysis, a screening analysis will be performed before performing a refined Full Impact Analysis. In a screening analysis, a screening background concentration will be added to the results of the Significance Analysis. Compliance with the State NAAQS will be

<sup>4</sup> Per the interim guidance provided by EPA during the EPA Regional/State/Local Dispersion Modelers Workshop, Portland, OR, May 10-13, 2010.

demonstrated if the resultant concentrations are less than 90 percent of the NAAQS. The procedure for obtaining the NO<sub>2</sub> 1-hour background concentration for use in the NAAQS analysis is discussed in a later part of this memorandum.

As discussed with the TCEQ during the conference call, if this methodology is used, GAF will provide an explanation to justify the emissions scenario modeled in the Full Impact Screening Approach. The explanation will be based on, but not limited to the following factors:

- List of other NO<sub>x</sub> emission sources at the GAF Dallas Plant not included in the modeling analysis
- Identification of near-by off-property NO<sub>x</sub> emissions sources outside the GAF Dallas Plant
- Justification regarding emissions sources not included in the assessment and why the analysis is a conservative screening approach
- Use of a screening background value (for e.g., use of H1H value instead of using 98<sup>th</sup> percentile)

### **Step 3: Full Impact Analysis – Inventory Modeling**

If compliance is not demonstrated via a full impact screening analysis, a refined Full Impact Analysis will be conducted for the NO<sub>2</sub> 1-hour averaging period. For the Full Impact Analysis, all permitted sources at the GAF Dallas Plant that emit NO<sub>2</sub> will be modeled with their potential-to-emit (PTE) emissions along with the off-property inventory sources only at significant receptors to obtain the total H1H concentration. According to TCEQ, significant receptors are defined as the receptors on which the modeled H1H concentration in the Significance Analysis equal to or exceeds the MSL value.

The Significance Analysis also defines the radius of impact (ROI) within which a Full Impact Analysis is required. According to TCEQ guidance, the ROI for an air quality dispersion modeling analysis is the farthest distance from the center of the GAF Dallas Plant to the receptor where modeled ground-level concentrations are equal to or greater than the proposed MSL.

Based on the ROI, the off-property inventory retrieval will be obtained from the TCEQ. The background concentration of NO<sub>2</sub> will be added to the total H1H modeled concentration and compared to the NAAQS. A concentration below the NAAQS will demonstrate the compliance. The procedure for obtaining the NO<sub>2</sub> 1-hour background concentration for use in the NAAQS analysis is discussed in a later part of this memorandum.

If compliance cannot be demonstrated with this approach, the following additional refinements may possibly be conducted:

- Modeling may be conducted with 5 years of meteorological data. The average H8H concentration among the five modeled concentrations will be summed with the background concentration for the NAAQS compliance demonstration.
- Modeling may be conducted to obtain the average of the 98<sup>th</sup>-percentile of the annual distribution of the daily maximum 1-hour concentration across all modeled years based on the procedure discussed in the EPA memo dated February 25, 2010.<sup>5</sup> The obtained concentration

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<sup>5</sup> EPA memorandum, *Notice Regarding Modeling for New Hourly NO<sub>2</sub> NAAQS*, February 25, 2010.

will be summed with the background concentration for the NAAQS compliance demonstration.

- Modeling may be conducted using the Plume Volume Molar Ratio Method (PVMRM)/ or Ozone Limiting Method (OLM). If either of these methods are used, a modeling protocol will be submitted to the TCEQ and U.S. EPA Region 6.

### Background Concentration

For this modeling analysis, the background concentration will be obtained from the EPA's Air Quality System website for the nearest monitor located in Dallas County (Site ID 48-113-0069).<sup>6</sup> This monitor is located at approximately 4 miles to the North of the GAF Dallas Plant. Per the EPA procedure for determining the NO<sub>2</sub> design value, the background concentration will be calculated as the most recent complete three year average of the 98<sup>th</sup>-percentile of daily maximum 1-hour concentrations over three years of monitor data.

The average 98<sup>th</sup>-percentile daily maximum 1-hour concentration at the EPA monitor (Site ID: 48-113-0069) over 2007, 2008, and 2009 is 102.19 µg/m<sup>3</sup> as shown in Table 2 below. GAF will use a value of 102.19 µg/m<sup>3</sup> for the background concentration in the Steps 2 and 3.

**Table 2. Background Concentration Summary**

Year	NO <sub>2</sub> Daily Maximum 1-hour Concentration	
	(ppm)	(µg/m <sup>3</sup> )
2007	0.056	105.31
2008	0.056	105.31
2009	0.051	95.96
<b>Average</b>	<b>0.054</b>	<b>102.19</b>

---

<sup>6</sup> URL: <http://www.epa.gov/ttn/airs/airsaqs/detaildata/downloadaqdata.htm>



**Javier Galvan - Re: GAF Dallas Plant: Conference Call Details for the Pre-modeling Meeting on May 20, 2010 at 11:00 AM**

---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Daniel Jamieson" <DJamieso@tceq.state.tx.us>  
**Date:** 5/19/2010 8:29 PM  
**Subject:** Re: GAF Dallas Plant: Conference Call Details for the Pre-modeling Meeting on May 20, 2010 at 11:00 AM  
**CC:** <JGalvan@tceq.state.tx.us>, <dmenende@tceq.state.tx.us>, <druggeri@tceq.state.tx.us>, <dharris@gaf.com>, <FBright@gaf.com>, <RJohnson@mailbmc.com>, Christine Chambers <CChambers@trinityconsultants.com>, Latha Kambham <LKambham@trinityconsultants.com>  
**Attachments:** GAF Dallas Plant\_ NO2 1-hr Modeling\_Proposed Approach (051910).pdf

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Mr. Jamieson,

Please find attached a brief memorandum summarizing the proposed NO2 1-hr modeling approach to demonstrate compliance with the new NO2 1-hr NAAQS. Javier confirmed that he is available for the 11:00 AM call tomorrow.

Please call me at (972) 661-8100, if you need any additional information prior to the conference call.

Thank you,  
 Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
 Consultant

Trinity Consultants  
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**TO:** Mr. Daniel Jamieson, TCEQ Modeling Group  
**CC:** Mr. Javier Galvan, TCEQ Air Permits Division  
Mr. Daniel Menendez and Mr. Domnick Ruggeri, TCEQ Modeling Group  
Mr. Doug Harris and Mr. Fred Bright, GAF Materials Corporation  
Ms. Latha Kambham, Trinity Consultants  
**FROM:** Ms. Christine M. Otto Chambers, Trinity Consultants  
**DATE:** May 19, 2010  
**RE:** GAF Dallas Plant – Proposed Modeling Approach for NO<sub>2</sub> (1-hour) Modeling

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the Texas Commission of Environmental Quality (TCEQ), on December 18, 2008 (2008 NSR permit amendment application). As part of this permit amendment application, GAF subsequently submitted an air dispersion modeling report on May 5, 2009. On May 11, 2010, TCEQ requested an air dispersion modeling analysis to demonstrate that emissions of nitrogen dioxide (NO<sub>2</sub>) would not cause or contribute to a violation of the newly promulgated NO<sub>2</sub> 1-hour National Ambient Air Quality Standard (NAAQS).<sup>1,2</sup>

This memo presents the proposed methodology that will be followed in performing the NO<sub>2</sub> (1-hour) State NAAQS modeling analysis. For the NO<sub>2</sub> 1-hour NAAQS compliance demonstration, GAF proposes to use the same approach for the UTM coordinate system, building wake effects, receptor grids, and meteorological data as detailed in the May 2009 air dispersion modeling report, with the following updates:

- The most current version of the AERMOD model (version 09292) will be used and
- The most current version of AERMOD terrain preprocessor (AERMAP version 09040) will be used

The specific modeling approach proposed for use in the NO<sub>2</sub> 1-hour State NAAQS Analysis is provided below.

#### **Step 1: Significance Analysis**

Per TCEQ guidance, the Significance Analysis considers the emissions associated with only the proposed project to determine whether it will have a significant impact upon the surrounding area. As stipulated in the 2008 NSR permit amendment application, there are three sources that result in an increase in NO<sub>x</sub> emissions. Table 1 lists these sources and the proposed emission rates to be used in the Significance Analysis.

<sup>1</sup> Per email from Mr. Javier Galvan, TCEQ, to Ms. Latha Kambham, Trinity Consultants, on May 11, 2010.

<sup>2</sup> The new NO<sub>2</sub> 1-hour NAAQS was published in the Federal Register (75 FR 6474) on February 9, 2010, and went into effect on April 12, 2010.

**Table 1. Proposed Emission Sources and NO<sub>x</sub> Emission Rates for Significance Analysis**

EPN	Source Description	Currently Permitted Emission Rate (lb/hr)	Proposed Allowable Emission Rate (lb/hr)	Increase in Emission Rate (lb/hr)
8	Thermal Oxidizer Exhaust Stack	0.72	1.90	1.18
8A	Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack			
WHBLR1	Waste Heat Recovery Boiler Natural Gas Burner Side	--	0.47	0.47

The NO<sub>x</sub> emissions will be multiplied by 0.75 to convert to NO<sub>2</sub> emission rates for air dispersion modeling purposes, per the Ambient Ratio Method.<sup>3</sup>

In the Significance Analysis, the maximum modeled ground-level concentrations (i.e., highest first high [H1H] modeled concentration) of NO<sub>2</sub> will be compared to the TCEQ proposed modeling significance level (MSL) of 4 µg/m<sup>3</sup>. If the modeled H1H concentration is below the TCEQ proposed MSL, demonstration will complete and no further analysis will be required.

If compliance is not demonstrated via the Significance Analysis, a Full Impact Analysis will be conducted as explained in Steps 2 and 3 below.

#### **Step 2: Full Impact Analysis – Screening Analysis**

As a first step in a State NAAQS analysis, a screening analysis will be performed to determine if a refined Full Impact Analysis is required. In a screening analysis, a background concentration will be added to the results of the Significance Analysis. Compliance with the State NAAQS will be demonstrated if the resultant concentrations are less than 90 percent of the NAAQS. The procedure for obtaining the NO<sub>2</sub> 1-hour background concentration for use in the NAAQS analysis is discussed in a later part of this memorandum.

#### **Step 3: Full Impact Analysis – Inventory Modeling**

If compliance is not demonstrated via a full impact screening analysis, a refined Full Impact Analysis will be conducted for the NO<sub>2</sub> 1-hour averaging period. For the Full Impact Analysis, all permitted sources at the GAF Dallas Plant that emit NO<sub>2</sub> will be modeled with their potential-to-emit (PTE) emissions along with the off-property inventory sources only at significant receptors to obtain the total H1H concentration. According to TCEQ, significant receptors are defined as the receptors on which the modeled H1H concentration in the Significance Analysis equal to or exceeds the MSL value.

The Significance Analysis also defines the radius of impact (ROI) within which a Full Impact Analysis is required. According to TCEQ guidance, the ROI for an air quality dispersion modeling

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<sup>3</sup> TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999, Appendix B.

analysis is the farthest distance from the center of the GAF Dallas Plant to the receptor where modeled ground-level concentrations are equal to or greater than the proposed MSL.

Based on the ROI, the off-property inventory retrieval will be obtained from the TCEQ. The background concentration of NO<sub>2</sub> will be added to the total H1H modeled concentration and compared to the NAAQS. A concentration below the NAAQS will demonstrate the compliance.

If compliance cannot be demonstrated with this approach, the following additional refinements may possibly be conducted:

- Modeling may be conducted with 5 years of meteorological data. The average H8H concentration among the five modeled concentrations will be summed with the background concentration for the NAAQS compliance demonstration.
- Modeling may be conducted to obtain the average of the 98<sup>th</sup>-percentile of the annual distribution of the daily maximum 1-hour concentration across all modeled years based on the procedure discussed in the EPA memo dated February 25, 2010.<sup>4</sup> The obtained concentration will be summed with the background concentration for the NAAQS compliance demonstration.
- Modeling may be conducted using the Plume Volume Molar Ratio Method (PVMRM)/ or Ozone Limiting Method (OLM). If either of these methods are used, the required inputs for the PVMRM/ OLM refined methodologies will be discussed with the TCEQ prior to use in the modeling analysis.

### Background Concentration

For this modeling analysis, the background concentration will be obtained from the EPA's Air Quality System website for the nearest monitor located in Dallas County (Site ID 48-113-0069).<sup>5</sup> This monitor is located at approximately 4 miles to the North of the GAF Dallas Plant. Per the EPA procedure for determining the NO<sub>2</sub> design value, the background concentration will be calculated as the most recent complete three year average of the 98<sup>th</sup>-percentile of daily maximum 1-hour concentrations over three years of monitor data.

The average 98<sup>th</sup>-percentile daily maximum 1-hour concentration at the EPA monitor (Site ID: 48-113-0069) over 2007, 2008, and 2009 is 102.19 µg/m<sup>3</sup> as shown in Table 2 below. GAF proposes to use a value of 102.19 µg/m<sup>3</sup> for the background concentration.

**Table 2. Background Concentration Summary**

Year	NO <sub>2</sub> Daily Maximum 1-hour Concentration	
	(ppm)	(µg/m <sup>3</sup> )
2007	0.056	105.31
2008	0.056	105.31
2009	0.051	95.96
<b>Average</b>	<b>0.054</b>	<b>102.19</b>

<sup>4</sup> EPA memorandum, *Notice Regarding Modeling for New Hourly NO<sub>2</sub> NAAQS*, February 25, 2010.

<sup>5</sup> URL: <http://www.epa.gov/ttn/airs/airsaqs/detaildata/downloadaqsdata.htm>

**Javier Galvan - GAF Dallas Plant: Conference Call Details for the Pre-modeling Meeting on May 20, 2010 at 11:00 AM**

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**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** <DJamieso@tceq.state.tx.us>, <JGalvan@tceq.state.tx.us>, <dharris@gaf.com>, <FBright@gaf.com>, <RJohnson@mailbmc.com>, <dmenende@tceq.state.tx.us>, <druggeri@tceq.state.tx.us>  
**Date:** 5/19/2010 11:26 AM  
**Subject:** GAF Dallas Plant: Conference Call Details for the Pre-modeling Meeting on May 20, 2010 at 11:00 AM  
**CC:** Christine Chambers <CChambers@trinityconsultants.com>, Latha Kambham <LKambham@trinityconsultants.com>

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Gentlemen,

I sent a meeting invitation request for the pre-modeling meeting yesterday. However, in case you have not received this request, please see below the email with the conference call details, and the attendees list.

I would really appreciate it if you could respond to this email and confirm the receipt of this email.

Thanks,  
 Latha

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Mr. Jamieson,

As we discussed last week, please find below the call-in details for the GAF Dallas Plant pre-modeling meeting scheduled for **May 20, 2010 (Thursday) at 11:00 AM**.

**Conference Dial-in Number: (712) 432-0850**  
**Participant Access Code: 797538#**

The purpose of this conference call is to discuss the proposed NO<sub>2</sub> 1-hr modeling approach and obtain the latest guidance from the TCEQ. We will provide a memorandum with the proposed modeling approach prior to the conference call.

The attendees list for this conference call is provided below:

- TCEQ Modeling Group: Mr. Daniel Jamieson (Mr. Daniel Menendez and Mr. Domnick Ruggeri, if available)
- TCEQ Permit Engineer: Mr. Javier Galvan
- GAF Dallas Plant: Mr. Doug Harris and Mr. Fred Bright
- Legal Counsel: Mr. Rodman Johnson, Attorney at Law
- Trinity Consultants: Ms. Christine Chambers and Ms. Latha Kambham

I just spoke with Mr. Menendez regarding his availability and he said he may not be available for this meeting. However, he said he would discuss the details with Mr. Galvan. I have left a voice mail for Mr. Ruggeri.

Thanks,

**Javier Galvan - Building Materials Corporation - NSR No. 7711A - draft RTC**

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**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 5/14/2010 3:56 PM  
**Subject:** Building Materials Corporation - NSR No. 7711A - draft RTC

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Erin,

Sorry for all of these e-mails, but I have been asked to ask of you one more request. My section manager has sent the draft RTC to Booker today, and due to the new 1-hour NO2 NAAQS promulgated by the EPA, we are having to review the project again. In other words, before the new rule, we were technically complete; however, as of now we are not, but we working on the "issue" and hope to resolve it as early as next Friday (we are re-running some modeling to demonstrate compliance with the new standard).

Having written all of that, can you notify me when you are ready to file the RTC with the OCC, assuming no changes to the RTC or after all changes are incorporated, before you actually do so? The reason is that if you are ready before we can state that we are technically complete, it will allow us to finish our technical review of the permit application before you file the RTC with the OCC. Thank you, and sorry for the long e-mail.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

**Javier Galvan - Building Materials Corp RTC**

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**From:** Stephanie Howell  
**To:** Booker Harrison  
**Date:** 5/14/2010 1:38 PM  
**Subject:** Building Materials Corp RTC  
**CC:** Galvan, Javier; Mike Gould; Selvera, Erin  
**Attachments:** HB801-RTC - Building Materials Corporation of America (7711A) (amend)

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Booker,

Attached is the RTC for Building Materials Corp. Erin was already assigned to this project, but I don't believe she's seen the RTC yet. Steve has already reviewed and approved the RTC so when you're ok with it, it's ready to be filed with OCC.

Thanks,  
Stephanie

**From:** Daniel Jamieson  
**To:** Kambham, Latha  
**CC:** Galvan, Javier  
**Date:** 5/14/2010 1:37 PM  
**Subject:** Re: GAF Dallas Plant: Proposed Schedule for the Pre-modeling Meeting

Latha,

Thursday, May 20 at 11 am will work for us.

Thanks,  
Dan

>>> Latha Kambham <[LKambham@trinityconsultants.com](mailto:LKambham@trinityconsultants.com)> 5/14/2010 12:37 PM >>>  
Mr. Jamieson,

As we discussed yesterday, GAF and Trinity are available on Thursday for a pre-modeling meeting to discuss the NO2 1-hr modeling. Please let us know if a conference call at 11:00 AM on Thursday (May 20th) will work for you and we will send out the conference call details.

We will provide a proposed modeling approach to you early next week.

Please call me at (972) 661-8100, if you would like to discuss the proposed schedule.

Thanks!  
Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
12770 Merit Drive, Suite 900  
Dallas, TX 75251  
Tel: 972-661-8100  
Fax: 972-385-9203  
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**From:** Allison Fischer  
**To:** Javier Galvan  
**Date:** 5/14/2010 9:41 AM  
**Subject:** Re: Building Materials Corporation of America 3rd Extension Request

Thanks

>>> Javier Galvan 5/13/2010 4:27 PM >>>  
Allison,

I have no objections to granting the extension to the company. Thank you.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

>>> Allison Fischer 5/13/2010 3:11 PM >>>  
Building Materials Corporation of America  
RN100788959  
Docket No.2008-0805-AIR-E  
Case No. 35904

The above-referenced respondent has submitted a third extension request on item 3.d of the referenced Order, seeking an extension of an additional 3 months (until October 29, 2010). Before sending this request to management, the Order Compliance Team is seeking your comments on whether or not to grant the extension. Please find attached a copy of the Order, the extension request letter, and the draft approval letter. Since this is a time-sensitive matter, please reply within 4 business days to this request. Thank you for your timely consideration of this matter.

Allison Fischer  
Enforcement Coordinator  
Texas Commission on Environmental Quality  
512-239-2574  
[afischer@tceq.state.tx.us](mailto:afischer@tceq.state.tx.us)

**Javier Galvan - Re: Building Materials Corporation of America 3rd Extension Request**

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**From:** Alyssa Taylor  
**To:** Fischer, Allison; Galvan, Javier  
**Date:** 5/14/2010 9:40 AM  
**Subject:** Re: Building Materials Corporation of America 3rd Extension Request

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I don't have a problem with this extension.

>>> Allison Fischer 5/13/2010 3:11 PM >>>  
Building Materials Corporation of America  
RN100788959  
Docket No.2008-0805-AIR-E  
Case No. 35904

The above-referenced respondent has submitted a third extension request on item 3.d of the referenced Order, seeking an extension of an additional 3 months (until October 29, 2010). Before sending this request to management, the Order Compliance Team is seeking your comments on whether or not to grant the extension. Please find attached a copy of the Order, the extension request letter, and the draft approval letter. Since this is a time-sensitive matter, please reply within 4 business days to this request. Thank you for your timely consideration of this matter.

Allison Fischer  
Enforcement Coordinator  
Texas Commission on Environmental Quality  
512-239-2574  
afischer@tceq.state.tx.us

**From:** Erin Selvera  
**To:** Javier Galvan  
**Date:** 5/14/2010 8:20 AM  
**Subject:** Re: RTC for Building Materials Corporation - NSR Permit No. 7711A

will do.

>>> Javier Galvan 05/13/10 7:41 PM >>>  
Erin,

I just received word that the electronic version of the draft RTC was sent to Booker, by the (my) section manager, on Monday, the 10th. If possible, can you check to determine if Booker has it, and if for some reason if he does not have it, please let me know so that we can try sending it again. Thanks.

Javier

>>> Erin Selvera 5/13/2010 1:56 PM >>>  
Thanks for the heads up on the potential phone calls. I have copies of the conditions, MAERT and tech review but don't have a draft of the RTC.

>>> Javier Galvan 5/13/2010 12:07 PM >>>  
Hello Erin,

I wanted to ask if you have received the RTC document/letter for the above-referenced company and permit. If not, please let me know so that I can attempt to determine where it is located (on whom's desk) and expedite its travel over to your desk for review. Also, I wanted to inform you that legal counsel for the company may contact you because the company wishes to expedite the potential hearing request review process. At this point in time I do not know whom that individual or group is, but the technical consultants representing the company (for my work) are Latha Kambham and Christine Chambers of Trinity Consultants. They too may also be contacting you.

Thank you.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

**Javier Galvan - Re: Building Materials Corporation of America 3rd Extension Request**

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**From:** Javier Galvan  
**To:** Fischer, Allison; Taylor, Alyssa  
**Date:** 5/13/2010 4:27 PM  
**Subject:** Re: Building Materials Corporation of America 3rd Extension Request

---

Allison,

I have no objections to granting the extension to the company. Thank you.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

>>> Allison Fischer 5/13/2010 3:11 PM >>>  
Building Materials Corporation of America  
RN100788959  
Docket No.2008-0805-AIR-E  
Case No. 35904

The above-referenced respondent has submitted a third extension request on item 3.d of the referenced Order, seeking an extension of an additional 3 months (until October 29, 2010). Before sending this request to management, the Order Compliance Team is seeking your comments on whether or not to grant the extension. Please find attached a copy of the Order, the extension request letter, and the draft approval letter. Since this is a time-sensitive matter, please reply within 4 business days to this request. Thank you for your timely consideration of this matter.

Allison Fischer  
Enforcement Coordinator  
Texas Commission on Environmental Quality  
512-239-2574  
afischer@tceq.state.tx.us

**From:** Allison Fischer  
**To:** Alyssa Taylor; Javier Galvan  
**CC:** Allison Fischer  
**Date:** 5/13/2010 3:11 PM  
**Subject:** Building Materials Corporation of America 3rd Extension Request  
**Attachments:** extension.35904.doc; 2008-0805-AIR-E.pdf; BMCA 3rd ext req.pdf

Reply requested by 5/17/2010

Building Materials Corporation of America  
RN100788959  
Docket No.2008-0805-AIR-E  
Case No. 35904

The above-referenced respondent has submitted a third extension request on item 3.d of the referenced Order, seeking an extension of an additional 3 months (until October 29, 2010). Before sending this request to management, the Order Compliance Team is seeking your comments on whether or not to grant the extension. Please find attached a copy of the Order, the extension request letter, and the draft approval letter. Since this is a time-sensitive matter, please reply within 4 business days to this request. Thank you for your timely consideration of this matter.

Allison Fischer  
Enforcement Coordinator  
Texas Commission on Environmental Quality  
512-239-2574  
afischer@tceq.state.tx.us

Mr. David Fuelleman, Plant Manager  
Building Materials Corporation of America  
2600 Singleton Boulevard  
Dallas, Texas 75212-3738

Re: Third Amended Schedule for Compliance with Ordering Provisions  
Building Materials Corporation of America; RN100788959  
Docket No. 2008-0805-AIR-E; Enforcement Case No. 35904  
Agreed Order Effective Date: February 8, 2009

Dear Mr. Fuelleman:

We are in receipt of a letter dated May 12, 2010, from Mr. Rod Johnson, Attorney, Brown McCarroll L.L.P., which requested an amended schedule for completion of Ordering Provision No. 3.d of the above-referenced Agreed Order. The letter also provided specific reasons for anticipated delays with previous schedules submitted to the TCEQ.

Based upon the reviewed information, we approve an amended schedule as requested. The new deadline for compliance with Ordering Provision No. 3.d is October 29, 2010.

Thank you for your continuing efforts to achieve compliance. If you have any questions, please contact Ms. Allison Fischer of the Enforcement Division staff at 512-239-2574.

Sincerely,

Bryan Sinclair, Director  
Enforcement Division

cc: Ms. Alyssa Taylor, Manager, Air Section, Dallas/Fort Worth Regional Office, TCEQ  
Mr. Rod Johnson, Attorney, Brown McCarroll L.L.P., 111 Congress Avenue, Suite 1400, Austin,  
Texas 78701-4043

Mr. David Fuelleman  
Page 2

bcc: Ms. Allison Fischer, Coordinator, Enforcement Division, MC 149A  
Central Records, MC 213, Building E, 1st Floor, Air Account No. DB0378S  
Enforcement Division Reader File

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
BUILDING MATERIALS  
CORPORATION OF AMERICA  
RN100788959

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§

BEFORE THE  
  
TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

AGREED ORDER  
DOCKET NO. 2008-0805-AIR-E

I. JURISDICTION AND STIPULATIONS

At its **JAN 28 2009** agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Building Materials Corporation of America ("the Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent appear before the Commission and together stipulate that:

1. The Respondent owns and operates an asphalt felts and coatings manufacturing plant at 2600 Singleton Boulevard in Dallas, Dallas County, Texas (the "Plant").
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. The Commission and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about May 7, 2008.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Fifty Thousand Nine Hundred Twenty-Five Dollars (\$50,925) is assessed by the Commission in settlement of the violations alleged in Section II



("Allegations"). The Respondent has paid Twenty Thousand Three Hundred Seventy Dollars (\$20,370) of the administrative penalty and Ten Thousand One Hundred Eighty-Five Dollars (\$10,185) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty. Twenty Thousand Three Hundred Seventy Dollars (\$20,370) shall be conditionally offset by the Respondent's completion of a Supplemental Environmental Project ("SEP").

7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and the Respondent have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that the Respondent conducted a stack test on the line no. 1 cooling section exhaust [a total of three stacks – emission point number ("EPN") COOL1] on April 24, 2008.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

## II. ALLEGATIONS

As owner and operator of the Plant, the Respondent is alleged to have:

1. Failed to comply with the permitted Maximum Allowable Emissions Rate Table ("MAERT") for the line 3 cooling section ("EPN COOL3") as determined during stack testing, in violation of 30 TEX. ADMIN. CODE § 116.115(b)(2)(F), Air Permit No. 7711A, Special Condition No. 1, and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on January 25, 2008. Specifically, at EPN COOL3, the permitted allowable hourly particulate matter ("PM") emission rate is 6.00 pounds per hour ("lbs/hr"), and during the stack test conducted on May 16 through May 27, 2005, the actual hourly PM emission rate was 29.84 lbs/hr.
2. Failed to comply with the permitted MAERT for the thermal oxidizer stack ("EPN 8") as determined during stack testing, in violation of 30 TEX. ADMIN. CODE § 116.115(b)(2)(F), Air Permit No. 7711A, Special Condition No. 1, and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on January 25, 2008. Specifically, at EPN 8, the

permitted allowable hourly sulfur dioxide ("SO<sub>2</sub>") emission rate is 0.73 lbs/hr, and during the stack test conducted on October 30 and 31, 2006, the actual hourly rate for SO<sub>2</sub> was 38.49 lbs/hr, the permitted allowable hourly oxides of nitrogen ("NO<sub>x</sub>") emission rate is 0.72 lbs/hr and the actual hourly rate for NO<sub>x</sub> was 2.15 lbs/hr, and the permitted allowable carbon monoxide ("CO") emission rate is 1.26 lbs/hr and the actual hourly rate for CO was 22.46 lbs/hr.

3. Failed to conduct stack testing on EPN COOL1, in violation of 30 TEX. ADMIN. CODE § 116.115(b)(2)(F), Air Permit No. 7711A, Special Condition No. 9, and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on January 25, 2008. Specifically, Special Condition No. 9 requires that it be sampled 180 days after the issuance of the permit dated October 21, 2004, which was no later than April 19, 2005.

### III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Building Materials Corporation of America, Docket No. 2008-0805-AIR-E" to:

Financial Administration Division, Revenues Section  
Attention: Cashier's Office, MC 214  
Texas Commission on Environmental Quality  
P.O. Box 13088  
Austin, Texas 78711-3088

2. The Respondent shall implement and complete a SEP in accordance with TEX. WATER CODE § 7.067. As set forth in Section I, Paragraph 6, Twenty Thousand Three Hundred Seventy Dollars (\$20,370) of the assessed administrative penalty shall be offset with the condition that the Respondent implement the SEP defined in Attachment A, incorporated herein by reference. The Respondent's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.
3. It is further ordered that the Respondent shall undertake the following technical requirements:
  - a. Within 60 days after the effective date of this Agreed Order, complete stack testing for EPN COOL3 for PM, and EPN 8 for SO<sub>2</sub>, NO<sub>x</sub>, and CO; or
  - b. Within 60 days after the effective date of this Agreed Order, submit an administratively complete permit amendment application to increase allowable emission limits for PM from EPN COOL3, and SO<sub>2</sub>, NO<sub>x</sub>, and CO from EPN 8, and comply with any

subsequently issued requirements and timelines for stack testing for PM from EPN COOL3 and for SO<sub>2</sub>, NO<sub>x</sub>, and CO from EPN 8;

- c. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the permit application within 30 days after the date of such requests, or by any other deadline specified in writing; and
- d. Within 240 days after the effective date of this Agreed Order, submit written certification of the results of the stack testing for EPN COOL3 for PM and EPN 8 for for SO<sub>2</sub>, NO<sub>x</sub>, and CO, or that either authorization to construct and operate a source of air emissions has been obtained or that construction/operation has ceased until such time that appropriate authorization is obtained. The certification shall include detailed supporting documentation including receipts and/or other records to demonstrate compliance, be notarized by a State of Texas Notary Public, and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team  
Enforcement Division, MC 149A  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

with a copy to:

Air Section, Manager  
Dallas/Fort Worth Regional Office  
Texas Commission on Environmental Quality  
2309 Gravel Drive  
Fort Worth, Texas 76118-6951

4. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
5. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days

after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.

6. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
7. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
8. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
9. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

## SIGNATURE PAGE

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Buddy Grcis  
For the Commission

Jan Siddle  
For the Executive Director

12/8/08  
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

David Fueleman  
Signature

24-November-2008  
Date

David Fueleman  
Name (Printed or typed)  
Authorized Representative of  
Building Materials Corporation of America

Plant Manager  
Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

**Attachment A**  
**Docket Number: 2008-0805-AIR-E**

**SUPPLEMENTAL ENVIRONMENTAL PROJECT**

<b>Respondent:</b>	<b>Building Materials Corporation of America</b>
<b>Penalty Amount:</b>	<b>Forty Thousand Seven Hundred Forty Dollars (\$40,740)</b>
<b>SEP Offset Amount:</b>	<b>Twenty Thousand Three Hundred Seventy Dollars (\$20,370)</b>
<b>Type of SEP:</b>	<b>Pre-approved</b>
<b>Third-Party Recipient:</b>	<b>Texas PTA – <i>Clean School Bus Program</i></b>
<b>Location of SEP:</b>	<b>Dallas County</b>

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

**1. Project Description**

**A. Project**

The Respondent shall contribute the SEP Offset Amount to the Third-Party Recipient named above. The contribution will be to *Texas PTA* for the *Clean School Bus Program* in Dallas County as set forth in an agreement between the Third-Party Recipient and the TCEQ. Specifically, the contribution will be used to reimburse local school districts for the cost of the following activities to reduce emissions: 1) replacing older diesel buses with alternative fuelled or clean diesel buses; or 2) retrofitting older diesel buses with new, cleaner technology. All dollars contributed will be used solely for the direct cost of the project and no portion will be spent on administrative costs. The SEP will be done in accordance with all federal, state and local environmental laws and regulations.

The Respondent certifies that it has no prior commitment to make this contribution and that it is being done solely in an effort to settle this enforcement action.

**B. Environmental Benefit**

This SEP will provide a discernible environmental benefit by reducing particulate emissions on buses by more than 90% below today's level and reducing hydrocarbons below measurement capability.

**C. Minimum Expenditure**

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

Building Materials Corporation of America  
Agreed Order Docket No. 2008-0805-AIR-E- Attachment A

**2. Performance Schedule**

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the Agreed Order with the contribution to:

Texas Congress of Parents and Teachers dba Texas PTA  
Clean School Bus Program  
Suzy Swan, Director of Finance  
408 West 11<sup>th</sup> Street  
Austin, Texas 78707

**3. Records and Reporting**

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division  
Attention: SEP Coordinator, MC 219  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

**4. Failure to Fully Perform**

If the Respondent does not perform its obligations under this SEP in any way, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Offset Amount.

In the event of incomplete performance, the Respondent shall include on the check the docket number of this Agreed Order and a note that it is for reimbursement of a SEP. The Respondent shall make the payment for the amount due to "Texas Commission on Environmental Quality" and mail it to:

Litigation Division  
Attention: SEP Coordinator, MC 175  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

**5. Publicity**

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

**6. Clean Texas Program**

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

**7. Other SEPs by TCEQ or Other Agencies**

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.



Buddy Garcia, *Chairman*  
Larry R. Soward, *Commissioner*  
Bryan W. Shaw, Ph.D., *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 5, 2009

### CERTIFIED MAIL

91 7108 2133 3935 2309 6548

Doug Harris, Plant Manager  
David Fuelleman, Plant Manager  
Building Materials Corporation of America  
2600 Singleton Boulevard  
Dallas, Texas 75212-3738

RE: Building Materials Corporation of America  
TCEQ Docket No. 2008-0805-AIR-E; Account No. DB0378S, Permit No. 7711A  
Agreed Order Assessing Administrative Penalties and Requiring Certain Actions

Enclosed is a copy of an order issued by the Commission.

Questions regarding the order should be directed to the Enforcement Coordinator or the Staff Attorney. If there are questions pertaining to the mailing of the order, then please contact Leslie Gann of the Texas Commission on Environmental Quality's Office of the Chief Clerk (MC 105) at (512) 239-3319.

Sincerely,

A handwritten signature in cursive script, reading "LaDonna Castañuela".

LaDonna Castañuela  
Chief Clerk

LDC/lg

Enclosure

cc: Melissa Keller, SEP Coordinator, TCEQ Enforcement Division (MC 219)  
Suzanne Walrath, Enforcement Coordinator, TCEQ Enforcement Division (MC 169)

Brown McCarrall

L.L.P.

111 Congress Avenue, Suite 1400, Austin, Texas 78701-4043  
512-472-5456 fax 512-479-1101  
direct (512) 479-1125 rjohnson@mailbmc.com

May 12, 2010

**RECEIVED**

**MAY 13 2010**

**ENFORCEMENT DIVISION**

Ms. Norma Salinas  
Order Compliance Team  
Texas Commission on Environmental Quality  
MC 149A  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Request for Third Extension of Agreed Order Deadline;  
TCEQ Docket No. 2008-0805-AIR-E

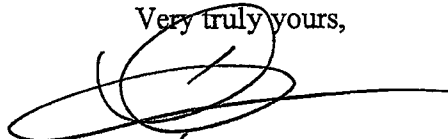
Dear Ms. Salinas:

Building Materials Corporation of America (BMCA) requests a third extension of the deadline in ordering provision 3.d. in the above-referenced Agreed Order. On December 28, 2009, TCEQ granted a second extension of the deadline until July 29, 2010.

Based on conversations with TCEQ Air Permits Division staff, a further extension of three (3) months on ordering provision 3.d is necessary due to a potential hearing request. BMCA will, of course, try to obtain the permit amendment sooner, but BMCA continues to reserve the right to request additional extensions as conditions warrant.

BMCA will reply promptly to any requests for additional information you may have and looks forward to TCEQ's favorable determination on this request.

Very truly yours,



Rod Johnson

cc: Suzanne Walrath, TCEQ  
Javier Galvan, TCEQ  
Doug Harris, GAF Materials Corporation

4431249.1  
13577.91231

Brown | M<sup>c</sup>Carroll  
L.L.P.

111 Congress Avenue, Suite 1400, Austin, Texas 78701-4043  
512-472-5456 fax 512-479-1101  
direct (512) 479-1125 rjohnson@mailbmc.com

May 12, 2010

Ms. Norma Salinas  
Order Compliance Team  
Texas Commission on Environmental Quality  
MC 149A  
P.O. Box 13087  
Austin, Texas 78711-3087

RECEIVED  
MAY 13 2010  
AIR PERMITS DIVISION

Re: Request for Third Extension of Agreed Order Deadline;  
TCEQ Docket No. 2008-0805-AIR-E

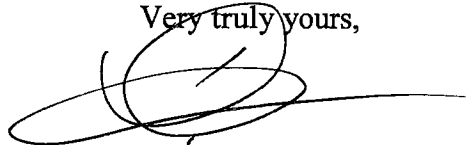
Dear Ms. Salinas:

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BMCA will reply promptly to any requests for additional information you may have and looks forward to TCEQ's favorable determination on this request.

Very truly yours,



Rod Johnson

cc: ✓ Suzanne Walrath, TCEQ  
✓ Javier Galvan, TCEQ  
Doug Harris, GAF Materials Corporation

4431249.1  
13577.91231

**Javier Galvan - Re: RTC for Building Materials Corporation - NSR Permit No. 7711A**

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**From:** Erin Selvera  
**To:** Galvan, Javier  
**Date:** 5/13/2010 1:56 PM  
**Subject:** Re: RTC for Building Materials Corporation - NSR Permit No. 7711A

---

Thanks for the heads up on the potential phone calls. I have copies of the conditions, MAERT and tech review but don't have a draft of the RTC.

>>> Javier Galvan 5/13/2010 12:07 PM >>>  
Hello Erin,

I wanted to ask if you have received the RTC document/letter for the above-referenced company and permit. If not, please let me know so that I can attempt to determine where it is located (on whom's desk) and expedite its travel over to your desk for review. Also, I wanted to inform you that legal counsel for the company may contact you because the company wishes to expedite the potential hearing request review process. At this point in time I do not know whom that individual or group is, but the technical consultants representing the company (for my work) are Latha Kambham and Christine Chambers of Trinity Consultants. They too may also be contacting you.

Thank you.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

**Javier Galvan - RTC for Building Materials Corporation - NSR Permit No. 7711A**

---

**From:** Javier Galvan  
**To:** Selvera, Erin  
**Date:** 5/13/2010 12:07 PM  
**Subject:** RTC for Building Materials Corporation - NSR Permit No. 7711A

---

Hello Erin,

I wanted to ask if you have received the RTC document/letter for the above-referenced company and permit. If not, please let me know so that I can attempt to determine where it is located (on whom's desk) and expedite its travel over to your desk for review. Also, I wanted to inform you that legal counsel for the company may contact you because the company wishes to expedite the potential hearing request review process. At this point in time I do not know whom that individual or group is, but the technical consultants representing the company (for my work) are Latha Kambham and Christine Chambers of Trinity Consultants. They too may also be contacting you.

Thank you.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

**Javier Galvan - Re: pre-modeling meeting**

---

**From:** Javier Galvan  
**To:** Jamieson, Daniel  
**Date:** 5/13/2010 10:32 AM  
**Subject:** Re: pre-modeling meeting

---

The company is Building Materials Corporation of America dba GAF Materials Corporation; NSR Permit No. 7711A. The project no. is 143272. We had finished the technical review of it in order to commence second public notice in order to complete the hearing request process, then the new 1-hour standard came into effect. I had initially tried to help them w/ the ratio technique, but it did not work, so I suggested to them that they try tweaking the modeling, in accordance with ADMT guidelines, in order to resolve the issue. Sorry for making you guys busier...

>>> Daniel Jamieson 5/13/2010 10:26 AM >>>  
Javier,

I had a message from Trinity Consultants wanting to set up a conference call to discuss NO2 modeling. They indicated that it was for a project that you are working on. What's the name of the company for the project?

Thanks,  
Dan

**Javier Galvan - Re: GAF - NSR No. 7711A**

---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**Date:** 5/11/2010 12:54 PM  
**Subject:** Re: GAF - NSR No. 7711A  
**CC:** Christine Chambers <CChambers@trinityconsultants.com>

---

Javier,

Thanks for providing us an update on the status of the NSR Permit Amendment Application. We will discuss the NO2 1-hr modeling issue with GAF and let you know about the proposed approach later this week.

Thanks!

Latha

\*\*\*\*\*  
Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
12770 Merit Drive, Suite 900  
Dallas, TX 75251  
Tel: 972-661-8100  
Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)  
\*\*\*\*\*

From: "Javier Galvan" <JGalvan@tceq.state.tx.us>  
To: "Latha Kambham" <LKambham@trinityconsultants.com>  
Date: 05/11/2010 12:16 PM  
Subject: GAF - NSR No. 7711A

---

Latha,

We are currently in the Response-to-Comments (RTC) process for the one hearing request, and so far everything is going smoothly (just taking a while). However, pursuant to the new EPA NO2 1-hour standard of 188 micrograms per cubic meter, we need to evaluate the site's predicted concentration for comparison to the new NAAQS for NO2. I tried a ratio technique for a quick comparison using the predicted 1-hour CO concentration, and site-wide hourly emissions, as a surrogate to the 1-hour NO2 concentration, and unfortunately it produces a value of 276, excluding any background. Also, pursuant to new instructions that we are receiving from upper management, we cannot issue/approve any permits that exceed the new 1-hour NO2 NAAQS.

Can you see if there is anything, modeling-related, that you can do in order to demonstrate compliance with this new standard? If nothing can be done, we may need to have a permit-and-modeling meeting w/ the modeling staff of APD to determine what approach we can take. "Tweaking" the modeling is acceptable, w/in certain guidelines of course, and we may wish to try that first before having to make any type of plant-wide operational change to any or all of the facilities at the site. Thanks.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

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The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you Received this in error, please contact the sender and delete the material from any computer.

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## **GAF ELK MATERIALS CORPORATION**

2600 Singleton Boulevard, Dallas, TX 75212

Tel: 214-637-1060

April 21, 2010

Texas Commission on Environmental Quality  
Office of the Chief Clerk, MC-105  
Attn: Notice Team  
P.O. Box 13087  
Austin, Texas 78711-3087

**AIR PERMITS DIVISION**

**APR 23 2010**

**RECEIVED**

*Re: Public Notice Requirements  
Permit Amendment Application  
TCEQ Permit No. 7711A  
Asphalt Roofing Production Facility  
Building Materials Corporation of America. – Dallas Plant – Dallas County  
TCEQ Account No. DB-0378-S, CN 602717464, RN 100788959*

**To Whom It May Concern:**

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 602717464, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the TCEQ, dated December 18, 2008. This permit amendment application was declared administratively complete on January 14, 2009. As a part of the air permitting process, the Dallas Plant published a formal public notice for the Notice of Receipt of Application and Intent to Obtain Permit (1<sup>st</sup> Notice) on February 5, 2009. The TCEQ issued a preliminary decision and the draft permit on February 8, 2010. The Dallas Plant is required to publish a formal public notice for the Notice of Application and Preliminary Decision (2<sup>nd</sup> Notice) in a newspaper of general circulation in the municipality nearest to the facility location. In accordance with the guidance package received from the TCEQ dated February 8, 2010, the Dallas Plant has completed the following for the 2<sup>nd</sup> Public Notice:

- Published a formal public notice on March 11, 2010 in the following newspapers circulated in Dallas, Dallas County:
  - The Dallas Observer (English)
  - El Extra (Spanish)
- Placed a copy of the permit amendment application and the Executive Director's preliminary decision (including the draft permit) at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Texas, for public viewing and copying, beginning March 11, 2010

The Dallas Plant is required to submit original newspaper clippings showing the publication date and newspaper name to the TCEQ within 10 business days after the date of publication. The Dallas Plant is also required to submit an original affidavit of publication and alternative language affidavit of publication within 30 calendar days after the date of publication. The Dallas Plant submitted the following on March 17, 2010:

- Original newspaper clippings showing publication date and newspaper name in English and Spanish languages
- Original Affidavit of Publication in English
- Original Alternative Language Affidavit of Publication

Within 10 business days after end of the designated comment period, the Dallas Plant is required to submit the Public Notice Verification Form to the TCEQ. As such, the Dallas Plant is submitting the Public Notice Verification Form and photocopies of these submittals are being mailed to the following, as listed on the *Notification List*:

U.S. Environmental Protection Agency  
Region 6  
Attn: Air Permits (6PD-R)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

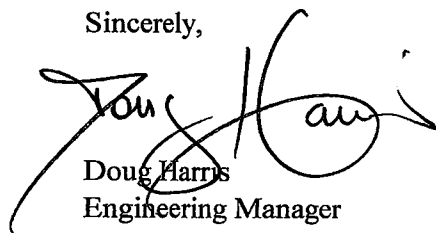
Texas Commission on Environmental Quality  
Office of Permitting and Registration  
Air Permits Division, MC-163  
Mr. Javier Galván, P.E.  
P.O. Box 13087  
Austin, Texas 78711-3087

Texas Commission on Environmental Quality  
Air Section Manager  
Dallas/Fort Worth Regional Office  
2309 Gravel Dr  
Fort Worth, Texas 76118-6951

Section Manager  
Air Pollution Control Program  
City of Dallas Environmental and Health Services  
320 E. Jefferson Blvd, Room LL13  
Dallas, Texas 75203-2632

If you have any questions, please call me at (214) 637-8909.

Sincerely,



Doug Harris  
Engineering Manager

cc: U.S. EPA Region 6, Air Permits (6PD-R)  
Mr. Javier Galván, P.E., TCEQ Office of Permitting and Registration  
Mr. Tony Walker, TCEQ Regional Office 4  
Mr. David Miller, City of Dallas, Air Pollution Control Program  
Mr. Fred Bright, GAF  
Mr. David Fuelleman, GAF



**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
**Public Notice Verification Form**  
**for Air Permitting**

Applicant Name: Building Materials Corporation of America

Site or Facility Name: GAF Materials

TCEQ Account Number (if applicable): DB-0378-S Permit Number: 7711A

Regulated Entity Number: RN100788959 Customer Number: CN602717464

All applicants must complete all applicable portions of this form. The completed form should be sent to the TCEQ to the attention of the Office of the Chief Clerk. For more information regarding public notice, refer to the instructions in the public notice package.

**ALTERNATIVE LANGUAGE CHECKLIST**

I have contacted the appropriate school district. ☒ YES ☐ NO

A bilingual education program is required by the Texas Education Code in the district. ☒ YES ☐ NO

School District: **Dallas Independent School District** Phone No.: **972-794-4300**

Person Contacted: **Ms. Genevieve Reyes** Date: **03/10/2009**

The name of the elementary school nearest to the proposed or existing facility is: **C F Carr Elementary School**

The name of the middle school nearest to the proposed or existing facility is: **Raul Quintanilla Sr Middle School**

The following language(s) is/are utilized in the bilingual program: **Spanish**

**If an applicable bilingual program exists, then applicants must publish a notice and/or post signs, as outlined in the Instructions for Public Notice and certify as applicable on this form.**

**ALTERNATIVE LANGUAGE VERIFICATION**

I verify that the area addressed by this permit application is subject to alternative language public notice requirements. ☒ YES ☐ NO

I verify that the applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located). ☒ YES ☐ NO

I verify that no such newspaper or publication was found in any of the alternative language(s) in which notice is required. ☐ YES ☒ NO

I verify that the publisher of the newspapers listed below refuse to publish the notice as requested, and no other newspaper or publication in the same language and of general circulation was found in the municipality or county in which the facility is located (or proposed to be located). ☐ YES ☐ NO ☒ N/A

Newspaper: \_\_\_\_\_ Language: \_\_\_\_\_

I verify that bilingual sign(s) required by the TCEQ were posted. (if applicable) ☒ YES ☐ NO  
(for 1<sup>st</sup> Notice)

I verify that original tear sheets of the newspaper alternative language notice(s) and the requested affidavits have been sent to the TCEQ. ☒ YES ☐ NO

Signed by: **Mr. Doug Harris**  Applicant: **Building Materials Corporation of America**

Title: **Engineering Manager** Date: **April 21, 2010**



**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
**Public Notice Verification Form**  
**for Air Permitting**

Applicant Name: Building Materials Corporation of America

Site or Facility Name: GAF Materials

TCEQ Account Number (if applicable): DB-0378-S Permit Number: 7711A

Regulated Entity Number: RN100788959 Customer Number: CN602717464

**NEW SOURCE REVIEW PERMIT NOTICE VERIFICATION**

I verify that the required signs (for 1<sup>st</sup> notice) were posted in accordance with the regulations and instructions of the TCEQ. ☒ YES ☐ NO

I verify that original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instructions of the TCEQ. ☒ YES ☐ NO

**Notice of Receipt of Application and Intent to Obtain Permit (1<sup>st</sup> Notice):**

I verify that a copy of the complete air quality application, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period. ☒ YES ☐ NO

**Notice of Application and Preliminary Decision (2<sup>nd</sup> Notice, if applicable):**

I verify that a copy of the complete air quality application and draft permit, and any revisions, are available for review and copying at the public place indicated below from the first day after newspaper publication; and

I also verify that the air quality application and draft permit, and any revisions, will remain in the designated public place until either:  
(1) the TCEQ acts on the application; or  
(2) the application is referred to the State Office of Administrative Hearings (SOAH) for hearing. ☒ YES ☐ NO

Name of Public Place: Dallas West Library

Address of Public Place: 2332 Singleton Boulevard, Dallas, Texas

Signed by: Mr. Doug Harris

Title: Engineering Manager

Date: April 21, 2010

**FEDERAL OPERATING PERMIT (TITLE V) NOTICE VERIFICATION**

I verify that the required signs were posted in accordance with the regulations and instructions of the TCEQ. ☐ YES ☐ NO

I verify that original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instruction of the TCEQ. ☐ YES ☐ NO

I verify that a copy of the complete air quality application and draft permit, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period. ☐ YES ☐ NO

Name of Public Place:

Address of Public Place:

Signed by:

Title:

Date:

**Javier Galvan - Re: GAF - NSR Permit No. 7711A**

---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**Date:** 4/14/2010 10:19 AM  
**Subject:** Re: GAF - NSR Permit No. 7711A  
**CC:** Latha Kambham <LKambham@trinityconsultants.com>

---

Javier,

Thank you so much for checking the Chief Clerk's database and providing the details. That is a good news. We will discuss with GAF regarding the first hearing request and see if there is any progress.

Thank you once again for your time and have a nice day,  
Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
12770 Merit Drive, Suite 900  
Dallas, TX 75251  
Tel: 972-661-8100  
Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)

\*\*\*\*\*

**From:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**To:** "Latha Kambham" <LKambham@trinityconsultants.com>  
**Date:** 04/14/2010 08:56 AM  
**Subject:** GAF - NSR Permit No. 7711A

---

Latha,

I just checked the Chief Clerk's Database regarding your inquiry, and so far nothing new is appearing on the "totals" list. Only the first hearing request, made during the first public notice comment period, is showing. As of now, the total number of comments received is 0, the total number of hearing requests received is 1, and the total number of public meetings received is 0. I have not seen any other

documents come my way pertaining to any "interested parties;" I usually get these at about the same time as the database is updated. Hope that helps.

Javier

Javier V. Galvan, P.E.  
Air Permits Division/New Source Review  
Mechanical/Construction Team  
(office) 512.239.1319  
(fax) 512.239.1400

---

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## **GAF ELK MATERIALS CORPORATION**

2600 Singleton Boulevard, Dallas, TX 75212

Tel: 214-637-1060

March 17, 2010

Texas Commission on Environmental Quality  
Office of the Chief Clerk, MC-105  
Attn: Notice Team  
P.O. Box 13087  
Austin, Texas 78711-3087

RECEIVED  
MAR 23 2010  
EMITS DIVISION

Re: *2<sup>nd</sup> Public Notice Requirements*  
*Permit Amendment Application*  
*TCEQ Permit No. 7711A*  
*Asphalt Roofing Production Facility*  
*Building Materials Corporation of America. – Dallas Plant – Dallas County*  
*TCEQ Account No. DB-0378-S, CN 602717464, RN 100788959*

**To Whom It May Concern:**

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 602717464, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the TCEQ, dated December 18, 2008. This permit amendment application was declared administratively complete on January 14, 2009. As a part of the air permitting process, the Dallas Plant published a formal public notice for the Notice of Receipt of Application and Intent to Obtain Permit (1<sup>st</sup> Notice) on February 5, 2009. The TCEQ issued a preliminary decision and the draft permit on February 8, 2010. As such, the Dallas Plant is required to publish a formal public notice for the Notice of Application and Preliminary Decision (2<sup>nd</sup> Notice) in a newspaper of general circulation in the municipality nearest to the facility location. In accordance with the guidance package received from the TCEQ on February 8, 2010, the Dallas Plant has completed the following:

- Published a formal 2<sup>nd</sup> public notice on March 11, 2010 in the following newspapers circulated in Dallas, Dallas County:
  - The Dallas Observer (English)
  - El Extra (Spanish)
- Placed a copy of the permit amendment application and the Executive Director's preliminary decision (including the draft permit) at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Texas, for public viewing and copying, beginning March 11, 2010

The Dallas Plant is required to submit original newspaper clippings showing the publication date and newspaper name to the TCEQ within 10 business days after the date of publication. The Dallas Plant is also required to submit an original affidavit of publication and alternative language affidavit of publication within 30 calendar days after the date of publication. As such, the Dallas Plant is submitting the following:

- Original newspaper clippings showing publication date and newspaper name in English and Spanish languages

- Original Affidavit of Publication in English
- Original Alternative Language Affidavit of Publication

Photocopies of these submittals are being mailed to the following, as listed on the *Notification List*:

U.S. Environmental Protection Agency  
Region 6  
Attn: Air Permits (6PD-R)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

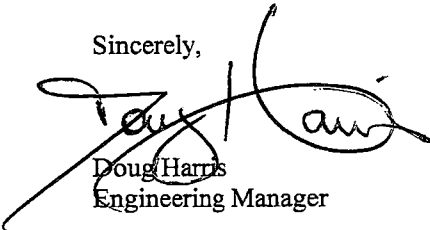
Texas Commission on Environmental Quality  
Office of Permitting and Registration  
Air Permits Division, MC-163  
Mr. Javier Galván, P.E.  
P.O. Box 13087  
Austin, Texas 78711-3087

Texas Commission on Environmental Quality  
Dallas/Fort Worth Regional Office  
2309 Gravel Dr  
Fort Worth, Texas 76118-6951

Section Manager  
Air Pollution Control Program  
City of Dallas Environmental and Health Services  
320 E. Jefferson Blvd, Room LL13  
Dallas, Texas 75203-2632

If you have any questions, please call me at (214) 637-8909.

Sincerely,



Doug Harris  
Engineering Manager

cc: U.S. EPA Region 6, Air Permits (6PD-R)  
Mr. Javier Galván, TCEQ Office of Permitting and Registration  
Mr. Tony Walker, TCEQ Regional Office 4  
Mr. David Miller, City of Dallas, Air Pollution Control Program  
Mr. Fred Bright, GAF  
Mr. David Fuelleman, GAF



AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS

§

COUNTY OF

Dallas

§

Before me, the undersigned authority, on this day personally appeared

Marie Earley

(name of newspaper representative)

, who being by me duly sworn,

deposes and says that (s)he is the

Sr. Account Executive

(title of newspaper representative)

of the

Dallas Observer

(name of newspaper)

; that said newspaper is generally circulated

in

Dallas

, Texas;

(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

3/11/10

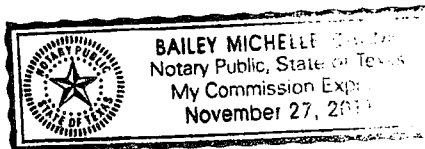
Mari Earley  
(newspaper representative's signature)

Subscribed and sworn to before me this the 15 day of March, 2011

to certify which witness my hand and seal of office.

Bailey Dhane  
Notary Public in and for the State of Texas

(Seal)



Bailey Dhane  
Print or Type Name of Notary Public

11/27/2011

My Commission Expires

TCEQ-Office of the Chief Clerk  
MC-105 Attn: Notice Team  
P.O. Box 13087  
Austin, Texas 78711-3087

Applicant Name: Building Materials Corporation of America  
Permit No.: 7711A  
Notice of Application and Preliminary Decision

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF DALLAS §

Before me, the undersigned authority, on this day personally appeared

EMMY SILVA, who being by me duly sworn, deposes  
(name of newspaper or publication representative)

and says that (s)he is the PUBLISHER  
(title of newspaper or publication representative)

of the EL EXTRA SPANISH LANGUAGE NEWSPAPER; that said newspaper or publication is generally circulated  
(name of newspaper or publication)

in DALLAS, DALLAS, COUNTY, Texas;  
(in the municipality or the same county as the location of the facility or the proposed facility)

that the attached notice was published in said newspaper or publication on the following date(s):

MARCH 11, 2010

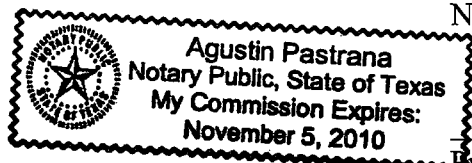
Emmy Silva  
(newspaper or publication representative's signature)

Subscribed and sworn to before me this the 11 day of MARCH, 2010

to certify which witness my hand and seal of office.

Agustin Pastrana  
Notary Public in and for the State of Texas

(Seal)



Agustin Pastrana  
Print or Type Name of Notary Public

11-5-2010  
My Commission Expires

# La cadena de supermercados Aldi llega al área de DFW

Garland- La cadena de supermercados Aldi generará cerca de 400 puestos de trabajo en el Norte de



Dallas- El Distrito Escolar Independiente de Dallas y el Colegio Mountain View, nombraron la high school e colegio temprano Trinidad "Trini" Garza en el Colegio Mountain View, en reconocimiento al reconocido líder cívico, negociante y antiguo integrante de la mesa directiva del DISD.

Texas y comenzará con una gran inauguración para la comunidad hispana que tendrá lugar el próximo 18 de marzo en la tienda de Garland, en el 1601 W. Northwest Hwy.

La ceremonia de inauguración dará inicio a las 10 de la mañana y una vez in-

augurado el supermercado tendrá acceso para el público. Acompañe a conocidos líderes hispanos comunitarios y a funcionarios de Aldi en la ceremonia inaugural del corte de cinta. Las visitas a las tiendas inaugurales incluyen muestras gratis de los productos ALDI.

Estas tiendas abrirán sus puertas al público el próximo 18 de marzo.

Mientras que otros supermercados están cerrando sus puertas, eliminando puestos de trabajo y dejando a los compradores con menos opciones de compra, la cadena de supermercados de productos selectos de descuento ALDI, inaugura sus primeras 11 tiendas en Texas, en el área del Metroplex de Dallas-Fort Worth, ofreciendo una alternativa más inteligente a los compradores que busquen ahorros sin sacrificar la calidad.

ALDI estará abriendo esta primavera un total de 27 tiendas en el Norte de Texas. Seguidamente a la apertura de estas 11 tiendas en marzo, otras 9 tiendas serán inauguradas en el mes de abril, y otras siete abrirán en Mayo.

"No puede haber mejor momento para bajos precios, buenos trabajos e inversiones que permanezcan en la comunidad", dice Scott Huska, vicepresidente de la división Aldi Denton. "Ya sea que los compradores nece-

siten hacer rendir su presupuesto o simplemente decidan tener más dinero para otras cosas. Los texanos del Norte de Texas pueden contar ahora con marcas selectas de alta calidad, a precios que nadie puede igualar".

ALDI invertirá más de 150 millones de dólares en bienes de capital en el mercado de Texas. La inversión efectuada en los mercados a nivel regional incluye la inversión de 50 millones de dólares en la planta de distribución de Denton, de 500 mil pies cuadrados, la cual ya ha generado 75 empleos a los residentes del área.

Adicionalmente a asociarse con proveedores locales, Aldi ha generado durante los últimos meses, más de 400 nuevos trabajos en el área de Dallas-Fort Worth y ofrece a sus empleados beneficios y salarios por encima de los estándares de la industria. Los empleados de Aldi, que trabajan un mínimo de 20 horas por semana, reciben todos los beneficios (incluyendo seguro médico, odontológico, de la vista, y planes 401k de retiro).

## Reparación masiva de fugas de agua

Dallas- El Programa WaterSense® de la Agencia de Protección Ambiental (EPA) ha seleccionado a nivel nacional al Servicio de Agua y Saneamiento de la Ciudad de Dallas para realizar la Semana de Repare una Fuga en el 2010. Dallas ganó el concurso nacional por su planificación de la Semana de Repare una Fuga.

"El Gran Evento de Dallas Repare una Fuga" se llevará a cabo entre el 15 y el 19 de marzo de 2010 para asistir a residentes de bajos ingresos precalificados, con las reparaciones de plomería en sus casas. Muy parecido a populares programas de reparaciones de hogares en televisión, el Servicio de Agua y Saneamiento de la Ciudad de Dallas realizará una significativa cantidad de trabajo en corto tiempo. En honor de la Semana de Repare una Fuga, el Servicio de Agua y Saneamiento de la Ciudad de Dallas impulsará el programa de reparaciones menores de plomería y completará todos los proyectos que se encuentran en su lista de espera.

"Las fugas pueden sumar más de 10 mil galones de agua desperdiciada en casas cada año -eso es suficiente para llenar una piscina en el patio trasero", dijo Jody Puckett, la Directora

cluyendo llaves de agua que gotean, inodoros con fugas y duchas que gotean.

Lowe's, el socio de ventas del año 2009 del programa WaterSense®, ofreció su apoyo para lograr que el evento en Dallas de la Semana de Repare una Fuga sea un éxito, coordinando con sus vendedores de inodoros y llaves de agua WaterSense® las donaciones de tan necesarios productos y asistiendo con el envío de estos productos. Los artículos y otras piezas de reemplazo serán generosamente donados por Kohler Company, el fabricante socio WaterSense® del año 2009, American Valve, Plumb Pak, Whirlpool, Watts, Korky y Fluidmaster.

En la mayoría de los casos, las piezas de reemplazo se compran fácilmente y pueden ser instaladas por los mismos propietarios, su ayudante favorito, un plomero o un socio de sistemas de riego de WaterSense®. A continuación, unas recomendaciones para ahorrar agua:

\* Reduzca las fugas de agua revisando los sellos en los llaves de agua por uso y, si es necesario, reemplace la llave de agua por un modelo con la marca WaterSense®.

\* Los inodoros con fugas son comúnmente el resultado de una goma usa-

## A TODAS LAS PERSONAS Y PARTES INTERESADAS:

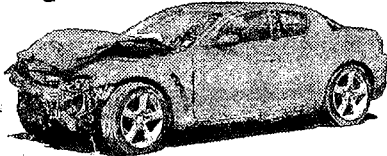
Building Materials Corporation of America se ha registrado con la Comisión de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar un Permiso de Calidad de Aire Núm. 7711A el cual autorizará la modificación de un(a) la Planta de Producción de Asfalto de Material para Techar en 2600 Singleton Boulevard, Dallas, Condado de Dallas, Texas 75212-3738. Información adicional sobre esta solicitud puede encontrarse en la sección de avisos públicos de esta publicación.

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Cerca de Escuelas y Comercios **214-370-5610**

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### AVISO PUBLICO

#### AVISO DE SOLICITUD Y DECISION PRELIMINAR PARA UN PERMISO DE CALIDAD DE AIRE

PERMISO DE CALIDAD DE AIRE NO. 7711A

**SOLICITUD Y DECISION PRELIMINAR.** Building Materials Corporation of America, se ha registrado con la Comisión de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar un Permiso de Calidad de Aire Núm. 7711A, el cual autorizará la modificación de un(a) la Planta de Producción de Asfalto de Material para Techar en 2600 Singleton Boulevard, Dallas, Condado de Dallas, Texas 75212-3730. La instalación existente va a emitir los siguientes contaminantes atmosféricos: partículas de materia incluyendo partículas de materia menores de 10 micras en diámetro, partículas de materia menores de 2.5 micrones en diámetro, dióxido de azufre, compuestos orgánicos, monóxido de carbono y óxido de nitrógeno.

El director ejecutivo de la TCEQ ha concluido la revisión técnica de la solicitud y ha preparado un permiso preliminar, el cual si es aprobado, establecerá las condiciones debajo de las cuales el sitio debiera operar. El director ejecutivo a hecho la decisión preliminar de otorgar este permiso. La solicitud del permiso, la decisión preliminar del director ejecutivo, y el permiso preliminar estarán disponibles para ser revisados y copiados en la Oficina Central de la TCEQ, en la oficina regional de TCEQ en Fort Worth, y en la Dallas West Library, 2332 Singleton Boulevard, Dallas, Condado de Dallas, Texas. Los archivos del cumplimiento de la ley de la calidad, si existen, están disponibles para la revisión del público en la Oficina Regional de Fort Worth de la TCEQ.

**COMENTARIOS PUBLICOS/JUNTA PUBLICA** Usted puede presentar comentarios públicos o solicitar una junta pública sobre esta solicitud. El propósito de la junta pública es el proveer la oportunidad de someter comentarios o hacer preguntas sobre esta solicitud. La TCEQ tendrá una junta pública si el director ejecutivo determina que hay suficiente interés de parte del público en esta solicitud o si es solicitada por un legislador local. Una junta pública no es una audiencia en controversia.

Comentarios por escrito o peticiones para juntas públicas sobre esta solicitud deberán recibirse por escrito en la Oficina del Secretario Principal (Office of the Chief Clerk), MC105, TCEQ, P.O. Box 13087, Austin, Texas 78711-3087, o por el Internet al [www.tceq.state.tx.us/about/comments.html](http://www.tceq.state.tx.us/about/comments.html) dentro de 30 días después de la publicación de este aviso.

Después del plazo final para someter comentarios públicos subsecuentes a cualquier Aviso de la Solicitud y de la Decisión Preliminar que se requiera, el director ejecutivo considerará los comentarios y preparará una respuesta a todos los comentarios públicos relevantes y materiales, o de otro modo significativos. La respuesta a los comentarios, junto con la decisión del director ejecutivo sobre la solicitud, serán entonces enviada por correo a todos aquellos que hallan sometido comentarios públicos o que hallan peticionado para estar en la lista de correo sobre esta solicitud. Si alguna solicitud para audiencia pública no es retirada, la correspondencia tendrá instrucciones sobre como solicitar una audiencia en controversia o como solicitar que la decisión del director ejecutivo sea reconsiderada.

**OPORTUNIDAD PARA UNA AUDIENCIA EN CONTROVERSIDAD**  
Una audiencia en controversia es un proceso legal semejante a un juicio civil en una corte de distrito estatal. Una persona que pueda ser afectada por las emisiones de contaminantes atmosféricos de la instalación tiene derecho a peticionar una audiencia en controversia. Para solicitar una audiencia en controversia, usted deberá proporcionar lo siguiente: (1) su nombre (o, para un grupo o asociación, un representante oficial), dirección postal, número de teléfono durante el día, y número de fax, si hay; (2) el nombre del solicitante y el número de permiso; (3) la oración en Inglés "I/we request a contested case hearing;" (4) una descripción específica de cómo le perjudicaría la solicitud y las emisiones atmosféricas de una manera que no es común con los miembros del público en general; (5) la localización y distancia de su propiedad en relación a la instalación; y (6) una descripción de cómo usted usa la propiedad que pudiera ser afectada por la instalación.

Una audiencia en controversia sólo se otorgará basada en asuntos en controversia que sean relevantes y materiales a la decisión de los Comisionados sobre la solicitud. Además, la Comisión sólo concederá una audiencia en controversia en esos asuntos que fueron presentados durante el período de los comentarios públicos y que no se retiraron. Asuntos como el valor de la propiedad, ruido, seguridad de tráfico, y zonas municipales están fuera de lo que la Comisión tiene la jurisdicción de considerar en este proceso.

**ACCION DEL DIRECTOR EJECUTIVO** Una solicitud para audiencia a sido recibida por la TCEQ dentro del plazo de tiempo requerido. A menos de que se presente una petición para una audiencia en controversia o una petición para que reconsidere su decisión, el director ejecutivo aprobará la solicitud para este permiso. Si se reciben peticiones para una audiencia en controversia o para que se reconsidere su decisión, el director ejecutivo no aprobará la solicitud para este permiso y remitirá la solicitud y las peticiones a los Comisionados de la TCEQ para su consideración en una junta Comisionados.

**LISTA PARA ENVIO DE CORREO** Usted puede solicitar ser incluido en una lista de correo para recibir información adicional con respecto a esta solicitud. Para ser incluido en una lista de correo, envíe su petición a la oficina del Office of Chief Clerk a la dirección que se encuentra a continuación en el párrafo titulado "Información."

**INFORMACION** Para mas información sobre la solicitud para este permiso o sobre el proceso de permisos, llame a la Oficina de Asistencia Pública (Office of Public Assistance), sin cargo a el 18006874040. Información general concerniente a la TCEQ puede encontrarse via Internet en <http://www.tceq.state.tx.us/>.

Mas información puede ser obtenida de Building Materials Corporation of America en la dirección en el primer párrafo o llamando a Mr. Doug Harris, Plant Engineer, al (214) 637-8909.

Fecha de Expedición: February 8, 2010

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•• 4343 Maple Ave. ••  
**214-528-1925**

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**214-528-1925**

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**214-916-0927**

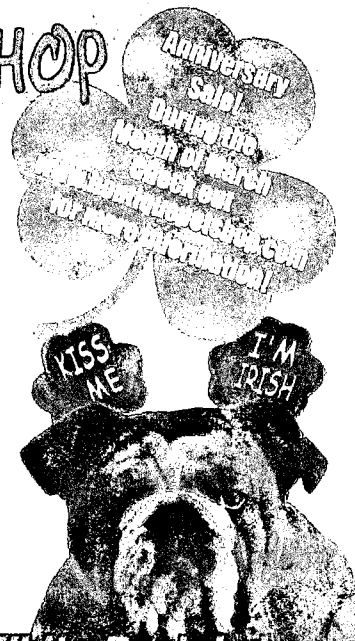


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TO ALL INTERESTED PERSONS AND PARTIES:

Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production Facility at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. Additional information concerning this application is contained in the public notice section of this newspaper.

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Dallas, TX 75219 214-522-EYES (3937)  
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**\$19** 1,000 BIZ CARDS  
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PROMO CODE: NTTCS1K

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FEDEX OVERNIGHT ONLY \$64

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www.MyLaserCourse2.com  
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The Stemmons, TX campus is a branch location of the ATI Career Training Center, Technology Blvd., Dallas, TX.

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ADDISON  
3753 BELT LINE RD.  
972-243-7070

## 100 Employment

103 Auditions/Show Biz  
105 Career/Training/Schools  
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127 Education  
130 Entertainment  
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### Public Notices

**All Star Towing & Storage**  
2703 Cartwright Dallas TX 75212  
214-819-3028  
**1999 Chevy Monte Carlo Black**  
VIN#: 2G1WW12M9296321  
Assessed to date: \$5,629.00  
**1998 Chevy Cavalier Black**  
VIN#: 1Y1SK5289WZ425588  
Assessed to date: \$5,472.25  
**1991 Toyota Camry Red**  
VIN#: 4T1SV24E3MU451803  
Assessed to date: \$8,803.35

145

### Management/Professional

ENGINEER-IOT Specialist, Research in Motion Corporation (US), Irving, TX. Perform analysis of logs to find root cause of problems & work w/feature designers to correct handset & driver code for found issues. Perform & analyze protocol & interoperability (IOT) on mobiles for multiple interfaces such as a CDMA 2000, EVDO Release 0, & RevA. Reqs: MS Deg in Electrl Engrng. Mail resume specifying job title & Req #TX4011 to PO Box 141394, Irving, TX, 75014-1394

#### JOB OPPORTUNITY IN STUDENT EXCHANGE!

#### AREA REPRESENTATIVE

- Goal oriented, team player, at least 25 years of age
- Recruit and screen potential host families
- Liaison to host families, high schools and students
- Training required and provided by experienced staff
- Industry leading compensation/bonuses in addition to international travel bonus

Call or email Larisa at

972-625-0391

lawaloski@hotmail.com

WWW.ISEUSA.COM

150

### Medical/Dental/Health

#### UCP OF NORTH TEXAS

#### Agency LVN Needed

Required: current TX LVN license; 1 yr HCS caseload exp; 1 yr working w/accepted nursing procedures for disabled individuals; MS Word/Excel literate; reliable transp. Must pass criminal/driving background check. Bilingual a plus.  
**Apply online at**  
**www.ucpnorthtexas.org/jobs.htm**

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### Sales

**FREE TO TRAVEL TO FL, CA OR HAWAII & MORE?** Come travel w/Adventure, The Wonder Cleaner. Expenses paid - lodging transportation, food, & cash daily. No exp nec, will train. 1.800.822.5858 or 1-877.323.6448



**Green Mountain Energy**

is hiring:

#### Sales Professionals

**Do you have a proven track record in sales?**

Field Sales Reps  
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Work at Trade Shows, Festivals, Concerts, Store Fronts, And more!!!

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This is **NOT** door to door or cold calling

Call (972) 265 4425  
Or email  
grassroots@greenmountain.com

www.greenmountain.com

#### INSIDE SALES

Telephone Appointment Setting  
Exp Required. Salary+Bonus  
\$10.00 per hour Plus \$25/appoint  
Part-Time. 972-505-9815

170

### Retail

**MYSTERY SHOPPERS**  
Get paid to shop! Retail/Dining establishments need undercover clients to judge quality/customer service. Earn up to \$150 a day.  
Call 214-453-4742

### RETAIL JOBS



**LOVE FASHION?**  
**BUFFALO EXCHANGE SEEKS BUYER/TRAINEES**  
Our eclectic buy-sell-trade clothing shop offers challenging, fun retail environment. Must be quick learner, cheerful, dependable, energetic. FT w/benefits. No exp nec.  
**Apply online or in person**  
**@ 3424 Greenville Ave**  
**www.BuffaloExchange.com**  
Not your regular retail job! EOE

### RETAIL SALES

**THE GAS PIPE**  
**Seeks Fulltime Sales People**  
Hourly + Commission.  
Medical, Dental, Pension.  
**APPLY IN PERSON:**  
Dallas: 18613 Marsh Ln Ste 500,  
214-483-9795;  
North Dallas: 9515 Skillman,  
214-553-9293;  
Oak Lawn: 4420 Maple Avenue,  
214-526-5982.  
Plano: 1725 N Central Exp.  
Suite 103, 972-422-6269

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### Restaurants/Hotels/Clubs

#### !BARTEND!

Up to \$500 a day. No experience necessary. Training Available.  
1-800-965-6520 x 197

**Coaches Corner**  
Nightclub in Oak Cliff is Seeking  
**EXP. BAR & WAIT STAFF**  
7439 S. Westmoreland  
**214-417-7940**

**BOMB SHELLS**  
**18 & UP**  
**NOW HIRING**  
**DANCERS**  
**BARTENDERS**  
**FLYER GIRLS**  
*apply in person*  
**2444 Walnut Ridge**  
**Dallas, TX 75229**  
**1-35N @ Walnut Hill Lane**  
**972.488.BOMB**  
**(2662)**  
**www.bombshellscabaret.com**

### Dishwasher-

### Dietary Dept.

Must be able to read and write, and follow verbal/written instructions. Hours are weekends only, 9:30 am - 6:00 pm. Please contact HR at 972-770-0883

### Facility Cook

Adult residential facility, 200 residents, part-time, including weekends. Call 214.352.5674, ext. 13. Criminal and driving records check, drug test. EOE.

### RESTAURANT / Bar

#### Now Hiring for Line Cook

for popular restaurant near downtown.

Apply in person:  
The Elbow Room, 3010 Gaston Ave, Dallas, TX 75226  
No Calls Please.

### Zen Bar /Ringo's Pub

#### North Dallas

**Now Hiring Bartenders/Servers**

Email Photo & Resume to:  
**b.harder@harderconcepts.com**

120

### Drivers/Delivery/Courier

**DRIVERS:** Top Drivers 2009  
\$85000 Frequent Hometime!  
Great Miles! CDL-A 401K, Insurance, Lease-Purchase Available.  
Hiring Recent Graduates!  
800-234-1534.

0527

### Public Notices

## NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

**PROPOSED PERMIT NUMBER: 7711A**

**APPLICATION AND PRELIMINARY DECISION.** Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. This application was submitted to the TCEQ on December 19, 2008. The facility will emit the following air contaminants: particulate matter including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Fort Worth Regional Office, and at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the Texas Commission on Environmental Quality Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

**MAILING LIST.** You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

**PUBLIC COMMENT/PUBLIC MEETING.** You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

You may submit additional written public comment to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087, or electronically at [www.tceq.state.tx.us/about/comments.html](http://www.tceq.state.tx.us/about/comments.html) within 30 days of the date of newspaper publication of this notice.

**OPPORTUNITY FOR A CONTESTED CASE HEARING.** After the deadline for public comment, the executive director will consider the comments and prepare a response to all relevant and material or significant public comment. **The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application. The mailing will also provide instructions for requesting a contested case hearing or reconsideration of the executive director's decision.**

A contested case hearing is a legal proceeding similar to a civil trial in a state district court. A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. A contested case hearing request must include the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "I/we request a contested case hearing;" (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility.

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period and have not been withdrawn. Issues that are not raised in public comments may not be considered during a hearing.

**EXECUTIVE DIRECTOR ACTION.** A timely hearing request has been received by the TCEQ. However, if all timely contested case hearing requests have been withdrawn and no additional comments are received, the executive director may issue final approval of the application. If all timely hearing requests are not withdrawn, the executive director will not issue final approval of the permit and will forward the application and requests to the Commissioners for their consideration at a scheduled commission meeting.

**INFORMATION.** If you need more information about this permit application or the permitting process, please call the Office of Public Assistance, toll free, at 1-800-687-4040. Si desea informacin en Espaol, puede llamar al 1-800-687-4040. General information about the TCEQ can be found at our Web site at [www.tceq.state.tx.us](http://www.tceq.state.tx.us).

Further information may also be obtained from Building Materials Corporation of America at the address stated above or by calling Mr. Doug Harris, Plant Engineer, at (214) 637-8909.

Notice Issuance Date: February 8, 2010

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### Public Notices

Public Notice - In compliance with Transportation Code 683.031, if you have a legal ownership in one of the following vehicles please contact the appropriate facility to reclaim the vehicle by paying all the accrued charges. Failure to reclaim the vehicle within 20 days from 03/04/10 is a waiver of all rights and title and interest in the vehicle and is consent to sell the vehicle at public auction. Dallas County Constable, Pct 4 will be taking these vehicles into custody and selling at public auction on or after 03/26/10 at 8825 S. Central (HWY 310) Dallas, TX if not claimed. For auction information call 972.636.0033

CE- Carr Storage, 2247 Wisconsin #108A, DALLAS, TX 75228-214.319.3001

KEYS	YR	MAKE	MOD	VIN	LICNO	LICST	KEYS	YR	MAKE	MOD	VIN	LICNO	LICST
CE	1	FORD	4D	2FAFP71W91X184929	UWL934	TX	CE	95	CHEV	2D	2G1WX12X8S9218971	38RH8D	TX
CE	95	BUC	4D	1GAAG55M5S8412658	FSK627	TX							

Public Notice - In compliance with Occupational Code 2303, if you have a legal ownership in one of the following vehicles please contact the appropriate facility to reclaim the vehicle by paying all of the accrued charges. Failure to reclaim the vehicle within 30 days from 3/05/10 is a waiver of all rights and title and interest in the vehicle and is consent to sell the vehicle at public auction. These vehicles will be selling at public auction on or after 04/05/10 at 714 E. Division St, Arlington, TX 76011 if not claimed. For auction information call 972.636.0033

A - A-Arlington Abandoned, 714 E. Division St, Arlington, TX - 817.461.7855

KEYS	YR	MAKE	MOD	VIN	LICNO	LICST	KEYS	YR	MAKE	MOD	VIN	LICNO	LICST
A	99	CHRY	4D	2C3HC56G4XH18348	073LUJ	TX	A	91	OLDS	4D	2G3AL54N2M2310508	FMH857	TX
A	97	PONT	4D	1G2NE52M6VC773247	587JUN	TX	A	99	CHRY	4D	2C3HD46R7X1725062	TCT531	TX
A	95	FORD	4D	1FALP92U2S4226944	DALLAH	TX	A	95	NISS	4D	JN1CA21D8S1645830	877NLE	TX
A	91	FORD	4D	2FACP74F4M129836	475REK	TX	A	87	DOOD	LL	384GD12T9M4708709	HDV988	TX
A	98	CHEV	4D	1G1ND52T4W8102933	CGK758	TX	A	93	DOOD	VN	184GH44R5P688334	H4JLJG	TX
A	80	HOND	CP	1HGCB715XLAD00890	GTK352	TX							

Public Notice - In compliance with Occupational Code 2303, if you have a legal ownership in one of the following vehicles please contact the appropriate facility to reclaim the vehicle by paying all of the accrued charges. Failure to reclaim the vehicle within 30 days from 03/05/10 is a waiver of all rights and title and interest in the vehicle and is consent to sell the vehicle at public auction. These vehicles will be selling at public auction on 04/09/10 at 8825 S. Central, Dallas Tx, 75241 if not claimed. For auction information call 972.636.0033

CH- Choice Towing 521 J Place Suite # B PLANO Tx 75074 972.665.4200

KEYS	YR	MAKE	MOD	VIN	LICNO	LICST	KEYS	YR	MAKE	MOD	VIN	LICNO	LICST
C	7	ZHEN	MD	LSY10P7A71146729			C	93	NISS	4D	JN1EB31P0PU20130	8R6F565	TX
C	93	FORD	VN	1FTFS240P0B2088	73DK7	TX	C	97	PLYM	VN	2P4FP258WV030805	KL0699	TX

**Javier Galvan - Re: GAF 2nd public notice - NSR No. 7711A**


---

**From:** Latha Kambham <LKambham@trinityconsultants.com>  
**To:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**Date:** 3/1/2010 11:25 AM  
**Subject:** Re: GAF 2nd public notice - NSR No. 7711A  
**CC:** Christine Chambers <CChambers@trinityconsultants.com>, Latha Kambham <LKambham@trinityconsultants.com>  
**Attachments:** GAF-Spanish Newspaper Ads for 2nd Notice (030110).doc

---

Javier,

Per our discussion this morning, I updated the Spanish version of the newspaper ad with your comments. Please find attached the revised version with updates marked using Track Changes. Please review and let us know if these updates are okay or if you have any additional changes.

Thanks!  
Latha

\*\*\*\*\*

Latha Kambham, Ph.D.  
Consultant

Trinity Consultants  
12770 Merit Drive, Suite 900  
Dallas, TX 75251  
Tel: 972-661-8100  
Fax: 972-385-9203  
[www.trinityconsultants.com](http://www.trinityconsultants.com)

\*\*\*\*\*

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**From:** Latha Kambham/Trinity Consultants  
**To:** "Javier Galvan" <JGalvan@tceq.state.tx.us>  
**Cc:** "Latha Kambham" <LKambham@trinityconsultants.com>, Christine Chambers/Trinity Consultants@TCI\_Dallas  
**Date:** 02/26/2010 12:43 PM  
**Subject:** Re: GAF 2nd public notice - NSR No. 7711A

---

Javier,

We prepared the Spanish versions of the newspaper ads per your guidance using the English versions of the ads and the Spanish versions from the 1st Public Notice. Can you please review these ads and approve them for publication in the newspaper. Please note the following:



**EXAMPLE SPANISH NOTICE TEMPLATE  
FOR PERMITS, FLEXIBLE PERMITS AND PERMIT AMENDMENTS**

**AVISO DE SOLICITUD Y DECISIÓN PRELIMINAR  
PARA UN PERMISO DE CALIDAD DE AIRE**

**PERMISO DE CALIDAD DE AIRE NO. 7711A**

**SOLICITUD Y DECISIÓN PRELIMINAR.** Building Materials Corporation of America, se ha registrado con la Comisión de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar un Permiso de Calidad de Aire Núm. 7711A, el cual autorizará la modificación de un(a) la Planta de Producción de Asfalto de Material para Techar en 2600 Singleton Boulevard, Dallas, Condado de Dallas, Texas 75212-3738. La instalación existente va a emitir los siguientes contaminantes atmosféricos: partículas de materia incluyendo partículas de materia menores de 10 micras en diámetro, partículas de materia menores de 2.5 micras en diámetro, dióxido de azufre, compuestos orgánicos, monóxido de carbono y óxido de nitrógeno.

**Comment [L1]:** Added zip code

**Comment [L2]:** Added PM2.5

El director ejecutivo de la TCEQ ha concluido la revisión técnica de la solicitud y ha preparado un permiso preliminar, el cual si es aprobado, establecera las condiciones debajo de las cuales el sitio debiera operar. El director ejecutivo a hecho la decisión preliminar de otorgar este permiso. La solicitud del permiso, la decisión preliminar del director ejecutivo, y el permiso preliminar estarán disponibles para ser revisados y copiados en la Oficina Central de la TCEQ, en la oficina regional de TCEQ en Fort Worth, y en la Dallas West Library, 2332 Singleton Boulevard, Dallas, Condado de Dallas, Texas. Los archivos del cumplimiento de la leyes de la facilidad, si existen, están disponibles para la revisión del público en la Oficina Regional de Fort Worth de la TCEQ.

**Comment [L3]:** Added TCEQ regional office, similar to English version

**COMENTARIOS PÚBLICOS/JUNTA PÚBLICA**

Usted puede presentar comentarios públicos o solicitar una junta pública sobre esta solicitud. El propósito de la junta pública es el proveer la oportunidad de someter comentarios o hacer preguntas sobre esta solicitud. La TCEQ tendra una junta pública si el director ejecutivo determina que hay suficiente interes de parte del público en esta solicitud o si es solicitada por un legislador local. Una junta pública no es una audiencia en controversia.



Comentarios por escrito o peticiones para juntas públicas sobre esta solicitud deberán recibirse por escrito en la Oficina del Secretario Principal (Office of the Chief Clerk), MC-105, TCEQ, P.O. Box 13087, Austin, Texas 78711-3087, o por el Internet al [www.tceq.state.tx.us/about/comments.html](http://www.tceq.state.tx.us/about/comments.html), dentro de 30 días después de la publicación de este aviso.

Después del plazo final para someter comentarios públicos subsecuentes a cualquier Aviso de la Solicitud y de la Decisión Preliminar que se requiera, el director ejecutivo considerará los comentarios y preparará una respuesta a todos los comentarios públicos relevantes y materiales, o de otro modo significativos. La respuesta a los comentarios, junto con la decisión del director ejecutivo sobre la solicitud, serán entonces enviada por correo a todos aquellos que hallan sometido comentarios públicos o que hallan petitionado para estar en la lista de correo sobre esta solicitud. Si alguna solicitud para audiencia pública no es retirada, la correspondencia tendrá instrucciones sobre como solicitar una audiencia en controversia o como solicitar que la decisión del director ejecutivo sea reconsiderada.

**OPORTUNIDAD PARA UNA AUDIENCIA EN CONTROVERSIA** Una audiencia en controversia es un proceso legal semejante a un juicio civil en una corte de distrito estatal. Una persona que pueda ser afectada por las emisiones de contaminantes atmosféricos de la instalación tiene derecho a petitionar una audiencia en controversia. Para solicitar una audiencia en controversia, usted deberá proporcionar lo siguiente: (1) su nombre (o, para un grupo o asociación, un representante oficial), dirección postal, número de teléfono durante el día, y número de fax, si hay; (2) el nombre del solicitante y el número de permiso; (3) la oración en inglés "I/we request a contested case hearing;" (4) una descripción específica de cómo le perjudicaría la solicitud y las emisiones atmosféricas de una manera que no es común con los miembros del público en general; (5) la localización y distancia de su propiedad en relación a la instalación; y (6) una descripción de cómo usted usa la propiedad que pudiera ser afectada por la instalación.

Una audiencia en controversia sólo se otorgará basada en asuntos en controversia que sean relevantes y materiales a la decisión de los Comisionados sobre la solicitud. Además, la Comisión sólo concederá una audiencia en controversia en esos asuntos que fueron presentados durante el período de los comentarios públicos y que no se retiraron. Asuntos como el valor de la propiedad, ruido, seguridad de tráfico, y zonas municipales están fuera de lo que la Comisión tiene la jurisdicción de considerar en este proceso.

**ACCIÓN DEL DIRECTOR EJECUTIVO** Una solicitud para audiencia a sido recibida por la TCEQ dentro del plazo de tiempo requerido. A menos de que se presente una petición para una audiencia en controversia o una petición para que reconsidere su decisión, el director ejecutivo aprobará la solicitud para este permiso. Si se reciben peticiones para una audiencia en controversia o para que se reconsidere su decisión, el director ejecutivo no aprobará la solicitud para este permiso y remitirá la solicitud y las peticiones a los Comisionados de la TCEQ para su consideración en una junta Comisionados.

**LISTA PARA ENVÍO DE CORREO** Usted puede solicitar ser incluido en una lista de correo para recibir información adicional con respecto a esta solicitud. Para ser incluido en una lista de correo, envíe su petición a la oficina del Office of Chief Clerk a la dirección que se encuentra a continuación en el párrafo titulado "Información."

**INFORMACIÓN** Para mas información sobre la solicitud para este permiso o sobre el proceso de permisos, llame a la Oficina de Asistencia Pública (Office of Public Assistance), sin cargo a el 1-800-687-4040. Información general concerniente a la TCEQ puede encontrarse vía internet en <http://www.tceq.state.tx.us/>.

Mas información puede ser obtenida de Building Materials Corporation of America en la dirección en el primer párrafo o llamando a Mr. Doug Harris, Plant Engineer, al (214) 637-8909.

Fecha de Expedición: February 8, 2010

# EXAMPLE

## Publication Elsewhere in the Newspaper:

<p><b>A TODAS LAS PERSONAS Y ENTIDADES INTERESADAS:</b></p> <p>Building Materials Corporation of America se ha registrado con la Comision de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar un Permiso de Calidad de Aire Núm. 7711A el cual autorizará la modificación de un(a) la Planta de Producción de Asfalto de Material para Techar en 2600 Singleton Boulevard, Dallas, Condado de Dallas, Texas 75212-3738. Información adicional sobre esta solicitud puede encontrarse en la sección de avisos públicos de esta publicación.</p>	